

EXHIBIT B

DECLARATION OF TYLER ANDREWS

MARK E. FERRARIO
Nevada Bar No. 1625
TYLER ANDREWS
Nevada Bar No. 9499
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Las Vegas, Nevada 89135
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Counsel for Defendant Groupon, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

LAS VEGAS SKYDIVING
ADVENTURES, LLC,

Plaintiff,

v.

GROUPON, INC.,

Defendant.

Case No.: 2:18-cv-02342-APG-VCF

**DECLARATION OF TYLER R.
ANDREWS, ESQ. IN SUPPORT OF
DEFENDANT GROUPON, INC.'S
MOTION FOR ATTORNEYS FEES**

I, Tyler R. Andrews, declares as follows:

1. I am a shareholder with the law firm of Greenberg Traurig, LLP, attorneys for Defendant Groupon, Inc. ("Groupon"), licensed to practice in Nevada and California.

2. I am over the age of eighteen and competent to make this declaration. I make this declaration based on my personal knowledge and in support of Groupon's motion to dismiss.

3. I have personal knowledge of the facts stated in this declaration, and could testify thereto if called upon to do so.

4. This Declaration is made in support of Defendant Groupon, Inc.'s Motion for Attorneys' Fees ("Motion")

5. Discovery in this case confirmed that this case had no valid factual basis for either liability or damages against Groupon. Indeed, discovery confirmed that only *five unique users*

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1 ever clicked on the Facebook Link at central issue in this case between the time it was posted and
2 the filing of the lawsuit (which is not surprising, given that the Mesquite Airport Facebook page
3 has a relatively small number of followers). Further, each of these unique “clicks” were most
4 likely Plaintiff’s principals and attorneys, as Plaintiff produced no evidence of a single actual
5 consumer confused by the Facebook Link at central issue in the case. As such, even if Plaintiff’s
6 trademark theory was not barred by Ninth Circuit precedent, and even assuming Plaintiff could
7 somehow establish that those five unique clicks were actually skydiving consumers confused over
8 the source of the Facebook Link rather than Plaintiff itself, Plaintiff’s damages would still have
9 totaled – at most – a few hundred dollars in potential lost profits from a few prospective customers.
10 Plaintiff was on notice of this fact since at least November of 2020, when this evidence was
11 obtained by Groupon and produced in discovery.

12 6. Plaintiff refused to agree upon reasonable terms for the deposition of a Groupon
13 employee and former Groupon employee who worked in an unrelated capacity at Groupon; Judge
14 Ferenbach ultimately ordered that an affidavit disclaiming involvement or knowledge, as opposed
15 to a deposition, was sufficient. Groupon offered a four-hour deposition, but Plaintiff’s counsel
16 refused any restrictions.

17 7. Plaintiff filed a motion to strike Groupon’s rebuttal expert report completely out of
18 the blue, more than six months after the expert report was served and nearly two months after the
19 close of discovery, without ever having mentioned the issue to Groupon. This motion was also
20 denied. When ordered to resolve “any remaining discovery disputes” by filing a joint status report,
21 I essentially begged Plaintiff to let me know what information Plaintiff was still seeking.
22 Plaintiff’s counsel instead responded with its input for the report mere hours before it was due, and
23 never provided Groupon a detailed list of outstanding issues.

24 8. Greenberg Traurig, LLP, maintains contemporaneous records of all fees and costs
25 for each billing matter. The Motion, pursuant to Local Rule 54-16, has been prepared, in relevant
26 part, directly from the records of Greenberg Traurig, LLP, and/or from direct billing records
27 received from third-party vendors.

28 9. The information contained in the Motion, along with all supporting exhibits, is

1 authentic, true and correct to the best of my knowledge, information and belief.

2 10. The amount of costs itemized in the Bill of Costs and Disbursements, filed
3 concurrently herewith, were actually incurred by Groupon. The costs itemized are not in any way
4 unusual, extraordinary, or excessive.

5 11. Groupon's fee request reflects a reasonable number of hours at a reasonable hourly
6 rate. The work performed is itemized and described in the invoices attached hereto as **Exhibit 1**
7 ("Groupon Legal Bills"). These invoices contain true and accurate descriptions, with limited
8 portions redacted for privilege and/or work product protection, of legal services performed by
9 Greenberg Traurig, LLP. Upon the Court's request, Groupon will submit true and correct
10 unredacted copies of its bills and invoices for legal services from Greenberg Traurig, LLP for the
11 Court's *in-camera* review.

12 12. The hourly rates for each attorney and legal professional as stated in the Groupon
13 Legal Bills, are the typical and usual hourly rates charged by each attorney and legal professional
14 employed by Greenberg Traurig, LLP, that has worked on this matter. These hourly rates were
15 not inflated, extraordinary, or excessive in any way.

16 13. The rates of Groupon's counsel are reasonable. Greenberg Traurig is one of the top
17 law firms in the world, and is recognized for its expertise in complex litigation and intellectual
18 property. Mark Ferrario, who oversaw the case, is a 40-year litigator with extensive experience in
19 state and federal court and an excellent statewide reputation. The biography of Mark Ferrario is
20 attached hereto as **Exhibit 2**. He has been named "Lawyer of the Year" on a number of occasions
21 in different practice areas, and has been listed in Chambers, The Best Lawyers in America, and
22 Super Lawyers, as well as Vegas Inc.'s "top lawyers." His hourly rate for this matter was \$700/hr.

23 14. I acted as lead counsel and oversaw the day-to-day strategy for this case. I have
24 been practicing law for 17 years. I am an experienced litigator with extensive background in
25 intellectual property litigation. My biography is attached hereto as **Exhibit 3**. I have received
26 numerous awards and accolades, including being listed in MyVegas magazine's "Top 100 Lawyers
27 in Las Vegas" in 2020. My hourly rate for this matter was also \$700/hr.

28

15. Bethany Rabe performed much of the behind-the-scenes work on this case. She has been practicing law for 13 years, specifically in the field of entertainment and intellectual property related litigation. She has an LLM from Harvard Law School, where she wrote her capstone piece on trademark law. She has also received numerous awards and accolades, including Vegas Inc.’s “Top Lawyers” recognition for intellectual property in 2021 and numerous Super Lawyers recognitions. The biography of Bethany Rabe is attached hereto as **Exhibit 4**. Her rate for this matter was \$390/hr.

16. A law clerk (now an associate at another law firm), Hugo Hernandez-Diaz, was asked to perform basic litigation research; his rate for this matter was \$225/hr. Paralegals Cynthia Ney (\$295/hr.) and Megan Sheffield (\$260/hr.) both provided support in this matter. They have 35 years of experience and 18 years of experience respectively. They have both been with Greenberg Traurig for approximately 14 years and are consummate professionals.

17. As is typical, the work is done by the lowest-billing attorney on the team who can effectively perform the work, supervised by others. Here, the lowest-billing attorney on the core team is Bethany Rabe, so she typically took the lead in researching and drafting motions and discovery, deposition outlines, and briefing, whereas I finalized briefing, developed strategy, communicated with counsel and the client, took and defended depositions, and appeared at hearings. Mark Ferrario consulted with the team on overall top-level strategy and attended hearings as well.

18. The overall average rate per hour, calculated by dividing the total fees requested by the total number of hours requested, is approximately \$561.00. The Groupon Legal Bills attached also reflect reductions for write-offs.

19. Overall, the rates here are comparable to those charged by other large law firms that have local offices in Las Vegas.

20. All factors under LR 54-14 are consistent with an award of fees in Groupon’s favor.

- a. ***The results obtained and the amount involved.*** Groupon obtained a full victory. It prevailed at the summary judgment stage on all remaining claims. According to Plaintiff’s initial disclosures and supplements thereto, Plaintiff

1 was seeking several million dollars in damages. *See Exhibit G* to Motion.

- 2 b. ***The time and labor required.*** This litigation lasted more than three years. *See*
3 *generally* ECF No. 1, filed in December of 2018. Over the course of that time,
4 Greenberg Traurig attorneys billed over a thousand hours, which resulted in
5 nearly \$600,000.00 in fees. Itemized descriptions of the work performed are
6 attached hereto as **Exhibit 1**. Certain entries have been removed or reduced,
7 leaving 881.89 hours and \$494,775.65 in fees requested. As noted herein,
8 Plaintiff's counsel's conduct drove up the costs of litigation significantly.
- 9 c. ***The novelty and difficulty of the questions involved.*** This case was difficult
10 for two reasons. First, intellectual property litigation tends to be more complex
11 than an average tort or contract dispute, and this case specifically involved
12 relatively novel theories of consumer confusion based on website metadata
13 coding and a uses in commerce that were entirely online. Second, this case was
14 difficult due to the positions taken by opposing counsel. As described above,
15 opposing counsel was unreasonable in its litigating position and also in its
16 conduct, particularly in regard to the numerous unnecessary motions it filed
17 throughout the case.
- 18 d. ***The skill requisite to perform the legal service properly.*** Intellectual property
19 is a complex area of the law, and a high level of skill was required to perform
20 the legal services properly. Specifically, counsel evaluated the trademark
21 claims, developed strategy to defend the litigation, drafted numerous complex
22 motions and oppositions, took or defended nine depositions, and appeared at
23 several hearings. As discussed above, the attorneys on the Groupon litigation
24 team are highly skilled.
- 25 e. ***The preclusion of other employment by the attorney due to acceptance of the***
26 ***case.*** Groupon's counsel's firm is of significant capacity, such that though
27 individual attorneys may have at times been working at capacity due to this
28 litigation, the firm was not, and the firm's other attorneys were not precluded

from performing other work.

- f. ***The customary fee.*** Customary fees were charged by the attorneys representing Groupon in this matter. In fact, many of the fees were significantly reduced based on previously negotiated discounts between Groupon and its counsel.
- g. ***Whether the fee is fixed or contingent.*** The fee was a fixed hourly rate depending on which attorney was doing the work. No aspect of the work was contingent. The billing was accomplished by tracking time in tenths of an hour (.1 = six minutes).
- h. ***The time limitations imposed by the client or the circumstances.*** There were no time limitations imposed by the client. . There were typical time limitations associated with litigation deadlines set by the Court and the federal rules.
- i. ***The experience, reputation, and ability of the attorneys.*** As explained *supra*, this case was staffed by several experienced and highly-qualified attorneys.
- j. ***The undesirability of the case, if any.*** Counsel does not submit that the desirability of the case is a factor in determining the reasonableness of the fees in this matter. The case was not undesirable and generally falls within the primary attorneys' areas of practice.
- k. ***The nature and length of the professional relationship with the client.*** Greenberg Traurig has represented Groupon since 2015.
- l. ***Awards in similar cases.*** Groupon obtained a complete victory in this case. It is difficult to compare any one case to any other given the unique facts of each case and the wide range of discovery expenses case-to-case. However, in other cases of similar complexity or where plaintiffs adopted similar tactics, courts have awarded similar amounts. *See Secalt*, 2010 U.S. Dist. LEXIS 138746, *aff'd*, *Secalt S.A. v. Wuxi Shenxi Constr. Mach. Co.*, 668 F.3d 677, 689 (9th Cir. 2012) (award of \$836,899.99 to prevailing defendants after Lanham Act summary judgment win, where plaintiff did not come forward with evidence supporting the basic element of its claim (hourly rates ranging from \$435/hr –

685/hr); *UA Corp. v. United Artist Studios LLC*, 2020 U.S. Dist. LEXIS 250490, at *3-4 (C.D. Cal. 2020) (awarding \$500,029.85 to prevailing plaintiff in Lanham Act case after grant of partial summary judgment and default judgment where the plaintiff's claims were remarkably strong and the defendants litigated the case in an unreasonable manner) *Teller v. Dogge*, 112 U.S.P.Q.2D (BNA) 1513, 1520 (D. Nev. 2014) (awarding \$500,000.00 in fees in Lanham Act and Copyright Act case with heavy motion practice, including a "difficult and unresponsive" defendant, and partial summary judgment followed by a default judgment); *Rubbermaid Commer. Prods., LLC.*, 2014 U.S. Dist. LEXIS 142745, at *15, *adopted* 2014 U.S. Dist. LEXIS 142738 (awarding \$232,820.30 in patent and copyright for fees case incurred over an eight-month period where the action was complex and the opposing party failed to cooperate during discovery or fully participate in the litigation); *see generally Boca Park Marketplace Syndications Grp. v. Ross Dress for Less*, 2020 U.S. Dist. LEXIS 96597, at *14 (D. Nev. 2020) (awarding \$1,119,808.80 in fees to prevailing defendant in breach of contract case that was litigated for more than two years, including cross-motions for summary judgment, before bench trial); *YWS Architects, LLC v. Alon Las Vegas Resort, LLC*, 2:17-cv-01417-RFB-VCF, ECF No. 126 (D. Nev. 2019) (finding \$304,015.75 for 603.95 hours of work performed over six months by Greenberg Traurig attorneys reasonable in mechanic's lien case with evidentiary hearing and heavy motion practice) (not published).

- m. ***Any other information the court may request.*** Groupon is happy to provide any additional information that would be helpful to the Court in evaluating Groupon's fee application.

21. This litigation lasted more than three years. Over the course of that time, Greenberg Traurig attorneys billed over a thousand hours, which resulted in nearly \$600,000.00 in fees. Itemized descriptions of the work performed are included in the Groupon Legal Bills, attached

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hereto as Exhibit 1. Certain entries have been removed or reduced, leaving 881.89 hours and \$494,775.65 in fees requested.

22. Groupon's fee request does not include any fees related to defending against the antitrust causes of action. The total fees in this case were close to \$600,000.00. Groupon has done the following to properly account for the fact that it is not seeking fees relating to the antitrust causes of action: (i) removed all fees billed by attorneys on the antitrust team assigned to this matter, which consisted of shareholder Greg Casas and associate Emily Willis Collins; (ii) removed the fees associated with responding to Plaintiff's motion for reconsideration of the order dismissing the antitrust claims; (iii) removed all fees for attorney time in attending the deposition of the Groupon antitrust deponent;¹ and (iv) removed fees billed by any attorney directly attributable to the antitrust claims not encompassed in the above. Additionally, because some parts of the litigation include billing for things applicable to all claims, Groupon has voluntarily reduced those entries: (i) for the time period between the start of the litigation and May 28, 2019, Groupon has reduced all time entries by half to account for time spent on the antitrust claims; (ii) for recent entries in October 2021 and onward, Groupon has reduced all time entries by seventy-five percent. As such, the fees sought herein were carefully assessed and do not include fees associated with the antitrust causes of action.

23. I declare under penalty of perjury under the laws of Nevada and the United States that the foregoing is true and correct.

DATED this 14th day of March, 2022.

GREENBERG TRAURIG, LLP

/s/ Tyler R. Andrews

TYLER ANDREWS
 Nevada Bar No. 9499

¹ However, as the prevailing party in the case, Groupon is entitled to costs associated with this deposition, which are requested in the corresponding bill of costs.

Exhibit 1



Invoice No. : 4981345
File No. : 156688.028600
Bill Date : January 1, 2019

Groupon, Inc.
[REDACTED]
[REDACTED]
PO# 211106
Chicago, IL

Attn: [REDACTED]
[REDACTED]

INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through December 31, 2018:

Total Fees:	\$	2,492.00
Current Invoice:	\$	<u>2,492.00</u>

MKG:AR
Tax ID: 13-3613083

Invoice No.: 4981345
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/26/18	Tyler R. Andrews	Move to LV Skydiving matter -- Begin initial research of [REDACTED] and prepare for request for extension of time to file response.	0.60	.30 420.00 210.00
12/27/18	Mark E. Ferrario	Telephone conference with opposing counsel and follow up with Tyler Andrews regarding extension and next steps.	0.30	.15 210.00 105.00
12/28/18	Tyler R. Andrews	Move to LV Skydiving matter -- Revise draft stipulated extension to respond to complaint and prepare same for review by opposing counsel.	0.40	.20 280.00 140.00
12/30/18	Tyler R. Andrews	Move to LV Skydiving matter -- Correspondence with opposing counsel regarding extension and submit draft of same for review.	0.30	.15 210.00 105.00
12/31/18	Tyler R. Andrews	Move to LV Skydiving matter -- Receive response from opposing counsel and incorporate extension for MTD opposition into stipulation draft; Update client re same.	0.40	.20 280.00 140.00
			<u>Total Time:</u>	4.80 1.0
			<u>Total Fees:</u>	\$ 2,492.00 \$700.00

Invoice No.: 4981345
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file



Invoice No.: 5020155
File No.: 156688.028600
Bill Date: February 5, 2019

Groupon, Inc.
[REDACTED]
[REDACTED]
PO# 211106
Chicago, IL

Attn: [REDACTED]
[REDACTED]

INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through January 31, 2019:

Total Fees:	\$	30,164.00
Current Invoice:	\$	<u>30,164.00</u>

MKG:AR
Tax ID: 13-3613083

Invoice No.: 5020155
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/01/19	Tyler R. Andrews	Receive and review correspondence from client on [REDACTED]	0.40	.20 280.00 140.00
01/02/19	Tyler R. Andrews	Develop strategy for motion to dismiss (.5); Revise stipulation to extend response dates for filing per correspondence with opposing counsel (.7).	1.20	.60 840.00 420.00
01/02/19	Tyler R. Andrews	Conduct research on [REDACTED] (.8); Finalize and send response to client regarding [REDACTED] (.6)	1.40	.70 980.00 490.00
01/02/19	Bethany L. Rabe	Prepare comments on motion to dismiss.	2.00	1.0 780.00 390.00
01/03/19	Tyler R. Andrews	Finalize stipulation and corporate disclosure statements (.50); conduct strategy call with client regarding [REDACTED] (.8); Begin draft outline of motion to dismiss including broad legal arguments (.6).	1.90	.95 1,330.00 665.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
01/07/19	Tyler R. Andrews	Prepare arguments to dismiss trademark claims on FYROSITY mark (1.2); Research [REDACTED] (.5).	1.70	.85 1,190.00 595.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
01/07/19	Bethany L. Rabe	Per T. Andrews, begin researching and drafting motion to dismiss.	2.90	1.45 1,131.00 565.50
01/08/19	Bethany L. Rabe	Per T. Andrews, continue drafting motion to dismiss, specifically the trademark portions and other Nevada state law causes of action.	4.00	2.0 1,560.00 780.00
01/09/19	Tyler R. Andrews	Begin comprehensive revision of draft motion to dismiss antitrust and trademark claims against Groupon.	1.00	.50 700.00 350.00
01/09/19	Bethany L. Rabe	Per T. Andrews, finish first draft of motion to dismiss, including combining section from antitrust group with sections on trademark and Nevada state law causes of action.	2.60	1.30 1,014.00 507.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
01/10/19	Tyler R. Andrews	Incorporate correspondence and data from client regarding [REDACTED] (0.6); Continue revisions and drafting of motion to dismiss (0.7).	1.30	.65 910.00 455.00
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Invoice No.: 5020155
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 2

01/10/19	Bethany L. Rabe	to dismiss. Per T. Andrews, evaluate structure and suggest different structure for antitrust section, as well as suggestions for cuts in that and in other sections to make more concise.	2.00	1.0	780.00	390.00
01/11/19	Tyler R. Andrews	Extensive revisions to motion to dismiss antitrust and trademark claims against Groupon.	3.70	1.85	2,590.00	1,295.00
01/14/19	Tyler R. Andrews	Complete final draft of motion to dismiss.	4.30	2.15	3,010.00	1505.00
01/14/19	Bethany L. Rabe	Per T. Andrews, revisit motion to dismiss to make changes to structure and streamline substance.	3.50	1.75	1,365.00	682.50
01/15/19	Tyler R. Andrews	Incorporate final edits and revisions from litigation team into final draft of motion to dismiss for forwarding to client for final review.	0.90	.45	630.00	315.00
01/15/19	Mark E. Ferrario	Revise motion to dismiss.	0.90	.45	630.00	315.00
01/24/19	Tyler R. Andrews	Review edits from client to draft motion to dismiss (.50); begin revisions to motion based on same (.40); Prepare for final compilation of RJN exhibits and filing (.40).	1.30	.65	910.00	455.00
01/24/19	Bethany L. Rabe	Work on finalizing exhibits for filing (.50); create new exhibits (.40); incorporate client revisions to draft and recirculate to team (.30).	1.20	.60	468.00	234.00
01/25/19	Tyler R. Andrews	Finalize motion to dismiss and all accompanying declarations (.30); Correspondence with client re [REDACTED] (.20);	0.70	.35	490.00	245.00
01/25/19	Bethany L. Rabe	Confirm filing and service of motion (.20). Per T. Andrews, draft detailed email regarding [REDACTED] (.70); coordinate regarding filing of motion to dismiss, including final review and exhibit discussions (.60).	1.30	.65	507.00	253.50
01/28/19	Tyler R. Andrews	Prepare for [REDACTED] with client (.50); conduct research re same (.40).	0.90	.45	630.00	315.00
<u>Total Time:</u>			56.20	20.55		
<u>Total Fees:</u>					\$ 30,164.00	\$11,362.50

Invoice No.: 5020155
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file



Invoice No.: 5023156
File No.: 156688.028600
Bill Date: March 3, 2019

Groupon, Inc.
[REDACTED]
[REDACTED]
PO# 211106
Chicago, IL

Attn: [REDACTED]
[REDACTED]

INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through February 28, 2019:

Total Fees: \$ 13,912.00

Current Invoice: \$ 13,912.00

Previous Balance (see attached statement): \$ [REDACTED]

Total Amount Due: \$ [REDACTED]

MKG:AR
Tax ID: 13-3613083

Invoice No.: 5023156
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>		<u>AMOUNT</u>	
02/04/19	Tyler R. Andrews	Finalize research [REDACTED] [REDACTED] (0.7); Draft substantive summary and recommendations for client (0.6).	1.30	.65	910.00	455.00
02/05/19	Tyler R. Andrews	[REDACTED] and send to client (0.3); Prepare for 26(f) conference with opposing counsel (0.5).	0.80	.40	560.00	280.00
02/06/19	Tyler R. Andrews	Draft status and strategy update for client.	0.40	.20	280.00	140.00
02/06/19	Bethany L. Rabe	Prepare audit letter response regarding Las Vegas Skydiving litigation.	0.80	.40	0.00	
02/06/19	Noemi Romero	Conducted detail review of conflict and condensed matter reports in response to audit request letter (.20); prepared attorney inquiry (.20); Corresponded with all responsible attorneys to confirm litigation and loss contingency information for possible inclusion in the audit response letter (.20); Prepared audit response letter for execution (.30).	0.90	.45	315.00	157.50
02/07/19	Tyler R. Andrews	Correspondence with client on [REDACTED] (0.3); Research on [REDACTED] (0.4).	0.70	.35	490.00	245.00
02/07/19	Eric J. Maiers	Work on audit response letter;	0.20	.10	140.00	70.00
02/08/19	Bethany L. Rabe	Draft motion to stay discovery.	1.50	.75	585.00	292.50
02/11/19	Tyler R. Andrews	Finalize draft of motion to stay discovery (1.2); Prepare for pending hearings on motions (0.6); Correspondence with client on [REDACTED] (0.4).	2.20	1.10	1,540.00	770.00
02/12/19	Tyler R. Andrews	Conduct meet and confer discussion with opposing counsel Gibson (0.4); Complete declaration in support of motion to stay (0.3); Complete final edits to motion to stay (0.5); Confirm briefing extension for reply in support of motion to dismiss (0.4).	1.60	.80	1,120.00	560.00
02/12/19	Bethany L. Rabe	Draft declaration in support of motion to stay discovery.	0.60	.30	234.00	117.00
02/13/19	Tyler R. Andrews	Finalize stipulation confirming briefing schedule on motion to dismiss (0.4); Finalize motion to stay discovery (0.4).	0.80	.40	560.00	280.00
02/19/19	Tyler R. Andrews	Correspondence with client regarding [REDACTED] (0.3); Prepare for conference (0.2).	0.50	.25	350.00	175.00
02/20/19	Tyler R. Andrews	Prepare for 26(f) conference.	0.50	.25	350.00	175.00
02/21/19	Tyler R. Andrews	Prepare for and conduct 26(f) conference (0.8); Update client with [REDACTED] (0.2); Begin research into [REDACTED] (0.5).	1.50	.75	1,050.00	525.00
02/27/19	Tyler R. Andrews	Review opposition to motion to stay (.9); Develop strategy for reply to same (.7).	1.60	.80	1,120.00	560.00
02/27/19	Bethany L. Rabe	Draft ESI protocol.	1.30	.65	507.00	253.50
02/27/19	Bethany L. Rabe	Review opposition to motion to stay discovery and begin developing strategy regarding the same.	0.80	.40	312.00	156.00
02/28/19	Tyler R. Andrews	Work on reply in support of motion to stay (1.3); Draft stip to extend reply for motion to	2.70	1.35	1,890.00	945.00

Invoice No.: 5023156
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

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02/28/19	Bethany L. Rabe	stay and discuss with opposing counsel (0.4); Revise ESI protocol and submit to client for review (0.4); Submit draft summary of Motion to stay opp to client for review (0.2). Call with opposing counsel (0.4)	2.70	1.35	1,053.00	526.50
██████	██████████████████	Begin drafting reply in support of motion to stay discovery. ██ ██	██████		██████0	
			<hr/>			
			<u>Total Time:</u>	24.80	11.70	
			<u>Total Fees:</u>		\$ 13,912.00	\$6,683.00

Invoice No.: 5023156
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

Page 3

Description of Expenses Billed:

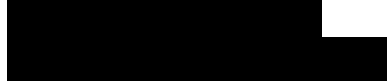
<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file



Invoice No.: 5054099
File No.: 156688.028600
Bill Date: April 2, 2019

Groupon, Inc.



Chicago, IL 211106

Attn:



INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through March 31, 2019:

Total Fees:	\$	15,330.00
Current Invoice:	\$	<u><u>15,330.00</u></u>

MKG:AC

Tax ID: 13-3613083

Invoice No.: 5054099
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/01/19	Tyler R. Andrews	Begin outline of stipulated confidentiality and protective order (0.4); Correspondence with opposing counsel regarding briefing schedule for motion to dismiss (0.5); Update client on [REDACTED] (0.3); Develop strategy on [REDACTED] (0.4); Review and approve stipulation on motion to dismiss briefing (0.2).	1.80	.90 575.15 287.58
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
03/01/19	Bethany L. Rabe	Work on opposition to motion to stay discovery.	2.10	1.05 373.85 186.93
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
03/03/19	Tyler R. Andrews	Receive and conduct initial review of LV Skydiving's opposition to motion to dismiss.	0.70	.35 223.67 111.84
03/03/19	Bethany L. Rabe	Review opposition to motion to dismiss.	0.20	.10 35.60 17.80
03/03/19	Bethany L. Rabe	Per T. Andrews, make revisions to reply in support of motion to stay discovery to streamline.	0.70	.35 124.62 62.31
03/03/19	Bethany L. Rabe	Per T. Andrews, look at [REDACTED] and develop strategy regarding the same.	0.60	.30 106.81 53.40
03/04/19	Tyler R. Andrews	Revise reply in support of motion to stay discovery (1.6); Revise Joint 26(f) report (0.6).	2.20	1.10 702.96 351.48
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
03/05/19	Tyler R. Andrews	Work on reply in support of motion to dismiss (0.6); Finalize draft of reply in support of motion to stay (0.6); Revise electronic discovery protocol (0.4); Correspondence with client (0.3).	1.90	.95 607.10 303.55
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
03/05/19	Bethany L. Rabe	Revise reply brief in support of motion to dismiss.	0.90	.45 160.22 80.11
03/06/19	Tyler R. Andrews	Correspondence with opposing counsel on discovery and briefing issues (0.7); Finalize and file joint 26(f) report (0.3); Finalize draft of reply in support of motion to stay (0.6); Revise reply in support of motion to dismiss (0.9).	2.50	1.25 798.82 399.41
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Invoice No.: 5054099
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 2

03/08/19	Tyler R. Andrews	Incorporate revisions to reply in support of motion to stay from client.	0.40	.20	127.81	63.90
03/08/19	Tyler R. Andrews	Research on [REDACTED] [REDACTED] (0.3); Initial review of antitrust section of reply in support of motion to dismiss (0.4).	0.70	.35	223.67	111.84
		[REDACTED]				
03/08/19	Bethany L. Rabe	Draft reply in support of motion to dismiss by researching and drafting trademark and state-law sections.	3.20	1.60	569.67	284.84
03/11/19	Tyler R. Andrews	Revise final draft of reply in support of motion to dismiss.	3.30	1.65	1,054.44	527.22
03/11/19	Emily W. Collins	Revise antitrust sections of reply to Motion to Dismiss.	0.60	.30	106.81	53.40
03/11/19	Bethany L. Rabe	Per T. Andrews, revise reply brief.	1.50	.75	267.03	133.52
03/12/19	Tyler R. Andrews	Receive and review order from Magistrate granting motion to stay discovery (0.6); Draft explanation of order and submit to client (0.3); Receive and review initial disclosures from Plaintiff and summarize same for client (0.4); Continue edits and revisions to reply in support of motion to dismiss (0.5)	1.80	.90	575.15	287.58
		[REDACTED]				
		[REDACTED]				
		[REDACTED]				
03/12/19	Mark E. Ferrario	Review order and follow up regarding scope of stay.	0.30	.15	95.85	47.93
03/12/19	Bethany L. Rabe	Evaluate order on motion to stay discovery (.2); evaluate initial disclosures (.3); draft letter to client summarizing ruling on motion to stay discovery and initial disclosures (.4); evaluate case law in motion to stay order regarding trademark law and develop strategy for motion to dismiss reply regarding the same (.3).	1.20	.60	213.63	106.82
03/13/19	Tyler R. Andrews	Receive and review comments and edits from client on substance of reply brief in support of motion to dismiss (0.6); Begin updated draft of reply brief based on revisions (0.8).	1.40	.70	447.34	223.67
		[REDACTED]				
03/13/19	Bethany L. Rabe	Per T. Andrews, review rule regarding initial disclosures for purposes of [REDACTED] [REDACTED]	0.20	.10	78.00	39.00
03/14/19	Tyler R. Andrews	Correspondence with client regarding reply in support of motion to dismiss (0.8); Substantive revisions to legal argument structure in reply brief (2.9).	3.70	1.85	1,182.25	591.13
		[REDACTED]				
03/14/19	Bethany L. Rabe	Per T. Andrews, make additional revisions to the reply in support of the motion to dismiss.	1.20	.60	213.63	106.82
03/15/19	Tyler R. Andrews	Receive and review additional updates to reply in support of motion to dismiss from client	2.10	1.05	671.01	335.50

Invoice No.: 5054099
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 3

		(0.6); Begin revised draft of reply and incorporate client edits into draft brief (0.8); Finalize reply draft and send to client (0.7).				
03/18/19	Tyler R. Andrews	Revisions to final draft of reply brief in support of motion to dismiss (1.8); Circulate brief to client (0.4); Review (0.4); Receive final edits from client and incorporate (0.3).	2.90	1.45	926.63	463.32
03/18/19	Bethany L. Rabe	Make client revisions to reply in support of motion to dismiss (.2); develop strategy regarding (0.3).	0.50	.25	89.01	44.50
03/25/19	Tyler R. Andrews	Receive and review 30(b)(6) deposition request from opposing counsel (0.4); Conduct research on (0.7); Correspondence with client regarding (0.5).	1.60	.80	1,120.00	560.00
03/25/19	Mark E. Ferrario	Review incoming documents from opposing counsel (0.3); review order (0.2).	0.50	.25	350.00	175.00
03/26/19	Tyler R. Andrews	Review correspondence from opposing counsel regarding Groupon 30(b)(6) representative depositions; Send same to client and develop strategy on response.	0.50	.25	350.00	175.00
<u>Total Time:</u>			55.20	20.6		
<u>Total Fees:</u>					\$ 15,330.00	\$6,185.40

Invoice No.: 5054099
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

Page 4

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file



Invoice No.: 5072833
File No. : 156688.028600
Bill Date : May 2, 2019

Groupon, Inc.

[REDACTED]

[REDACTED]

PO# 211106

Chicago, IL

Attn:

[REDACTED]

[REDACTED]

INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through April 30, 2019:

Total Fees: \$ 7,587.00

Current Invoice: \$ 7,587.00

Previous Balance (see attached statement): \$ [REDACTED]

Total Amount Due: \$ [REDACTED]

* * * * *

MKG:AR

Tax ID: 13-3613083

Invoice No.: 5072833
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>	
04/02/19	Tyler R. Andrews	Receive and review first set of document requests from LV Skydiving and begin outlining potential objections re same.	0.60 .30	420.00	210.00
04/02/19	Bethany L. Rabe	Evaluate discovery requests and develop strategy for production.	0.30 .15	117.00	58.50
04/03/19	Tyler R. Andrews	Receive and review deposition notices from Las Vegas Skydiving (0.3); Begin draft of objections and responses to deposition notices and RFP (0.6); Discuss discovery strategy with client (0.6); Draft response to opposing counsel regarding scope and availability (0.4).	1.90 .95	1,330.00	665.00
04/07/19	Bethany L. Rabe	Work on responses to requests for production of documents.	0.20 .10	78.00	39.00
04/08/19	Tyler R. Andrews	Correspondence with opposing counsel regarding proposed 30(b)(6) depositions.	0.40 .20	280.00	140.00
04/08/19	Bethany L. Rabe	Create objections to 30(b)(6) deposition topics per T. Andrews.	1.30 .65	507.00	253.50
04/09/19	Tyler R. Andrews	Finalize and submit objections to 30b6 deposition notices to client for review.	0.90 .45	630.00	315.00
04/09/19	Tyler R. Andrews	Receive responses from opposing counsel regarding discovery objections and depositions and update client regarding same.	0.40 .20	280.00	140.00
04/10/19	Tyler R. Andrews	Develop strategy regarding 30(b)(6) depositions and preparation sessions.	0.50 .25	350.00	175.00
04/11/19	Tyler R. Andrews	Correspondence with opposing counsel regarding deposition scope and availability.	0.30 .15	210.00	105.00
04/12/19	Tyler R. Andrews	Receive amended deposition notices and draft objections to same.	0.40 .40	280.00	140.00
04/12/19	Bethany L. Rabe	Per T. Andrews, update 30(b)(6) objections to reflect new deposition notices.	0.20 .10	78.00	39.00
04/13/19	Bethany L. Rabe	Work on objections to document requests.	0.60 .30	234.00	117.00
04/15/19	Bethany L. Rabe	Research [REDACTED].	0.20 .10	78.00	39.00
04/17/19	Tyler R. Andrews	Develop strategy for [REDACTED].	0.60 .30	420.00	210.00
04/17/19	Bethany L. Rabe	Create bullet list of documents potentially responsive to document requests.	0.50 .25	195.00	97.50
04/18/19	Tyler R. Andrews	Finalize draft of SPO and send to client to review (0.7); Review and revise list of documents required from client (0.3); Develop strategy regarding pending discovery (0.4).	1.40 .70	980.00	490.00
04/29/19	Tyler R. Andrews	Correspondence with client re [REDACTED] (0.6); Correspondence with opposing counsel re responses and SPO (0.4); Draft demand for initial disclosure documents (0.2).	1.20 .60	840.00	420.00
04/30/19	Tyler R. Andrews	Correspondence with opposing counsel re Groupon discovery issues.	0.40 .20	280.00	140.00
<u>Total Time:</u>			12.30 6.35		
<u>Total Fees:</u>				\$ 7,587.00	\$3,793.50

Invoice No.: 5072833
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

Page 2

Description of Professional Services Rendered

Invoice No.: 5072833
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

Page 3

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file



Invoice No.: 5111663
File No. : 156688.028600
Bill Date : June 4, 2019

Groupon, Inc.

[REDACTED]
[REDACTED]

PO# 211106
Chicago, IL

Attn: [REDACTED]
[REDACTED]

INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through May 31, 2019:

Total Fees: \$ 33,016.00

Expenses:

Exhibits

44.70

Total Expenses: \$ 44.70

Current Invoice: \$ 33,060.70

* * * * *

MKG:DK
Tax ID: 13-3613083

Invoice No.: 5111663
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/01/19	Tyler R. Andrews	Prepare for and conduct deposition prep call with Groupon counsel and deposition witness.	0.80 .40	560.00 280.00
05/01/19	Tyler R. Andrews	Correspondence with opposing counsel regarding Rule 26 disputes and stipulated protective order.	0.40 .20	280.00 140.00
05/02/19	Tyler R. Andrews	Conduct follow up deposition prep call with Groupon witness on pricing issues (0.7); Calls with Groupon counsel to discuss [REDACTED] (0.4); Call with opposing counsel and conduct meet and confer on disputes over protective order (0.5).	1.60 .80	1,120.00 560.00
05/02/19	Bethany L. Rabe	Analyze proposed stipulated protective order provided by LV Skydiving in preparation of further negotiations on this issue.	0.80 .40	312.00 156.00
05/06/19	Tyler R. Andrews	Conduct initial deposition prep call with Groupon witness on search engine optimization and marketing issues (0.7); Prepare for pending RFP response production to opposing counsel and discuss with client (0.5); Revise draft SPO from opposing counsel and circulated edited version to all parties (0.7)	1.90 .95	1,330.00 665.00
05/07/19	Tyler R. Andrews	Additional correspondence with opposing counsel regarding terms of SPO (0.5); Prepare for meet and confer with Steve Gibson (0.4); Draft additional revisions to proposed SPO (0.4); Review documents for deposition prep (0.4).	1.70 .85	1,190.00 595.00
05/07/19	Bethany L. Rabe	Make revisions to plaintiff's proposed stipulated protective order.	0.80 .40	312.00 156.00
05/08/19	Tyler R. Andrews	Prepare for and conduct meet and confer with Steve Gibson over purported violations of discovery stay.	0.90 .45	630.00 315.00
05/08/19	Bethany L. Rabe	Review documents in preparation for T. Andrews' meet and confer and develop strategy regarding the same.	0.90 .45	351.00 175.50
05/09/19	Tyler R. Andrews	Conduct call with client to discuss [REDACTED] (0.8); Receive and review additional revised draft of SPO from opposing counsel (0.4)	1.20 .60	840.00 420.00
05/09/19	Bethany L. Rabe	Evaluate plaintiff's changes to stipulated protective order.	0.20 .10	78.00 39.00
05/10/19	Tyler R. Andrews	Receive and review revised RFP responses from client and prepare for production (0.6); Correspondence with opposing counsel and approve latest version of SPO for filing with Court (0.4); Revise final RFP responses and objections and receive initial batch of responsive documents from Groupon for review and production (1.2); Oversee and coordinate compilation of Groupon documents	3.10 1.55	2,170.00 1085.00

Invoice No.: 5111663
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 2

Description of Professional Services Rendered

		and responses for production and serve same on opposing counsel (0.9).				
05/10/19	Bethany L. Rabe	Revise Groupon discovery responses based on client input.	0.70	.35	273.00	136.50
05/13/19	Tyler R. Andrews	Correspondence with opposing counsel regarding alleged deficient Groupon responses and request for meet and confer (0.6); Receive and review signed SPO entered by Court (0.3); Develop strategy regarding [REDACTED]	2.50	1.25	1,750.00	875.00
		[REDACTED] (0.4); Receive and review batches of responsive documents from client for production (1.2);				
05/14/19	Tyler R. Andrews	Receive additional documents from client for review and production in response to RFP's (0.8); Draft cover letter to opposing counsel identifying the produced documents by bates stamp and categor and finalize service by FTP (0.4).	1.20	.60	840.00	420.00
05/14/19	Megan L. Sheffield	Prepare final production materials referenced in Responses to Plaintiff's First RFPs.	1.70	.85	442.00	221.00
05/15/19	Tyler R. Andrews	Provide final production set to client to assist in deposition prep.	0.30	.15	210.00	105.00
05/17/19	Tyler R. Andrews	Prepare for and conduct comprehensive meet and confer with opposing counsel Steve Gibson regarding purported deficiencies with Groupon discovery production.	1.40	.70	980.00	490.00
05/20/19	Tyler R. Andrews	Review caselaw provided by opposing counsel for request to withdraw Groupon RFP objections (0.4); Develop strategy for [REDACTED]	1.00	.50	700.00	350.00
		[REDACTED] (0.6).				
05/20/19	Bethany L. Rabe	Research case law provided by opposing counsel regarding discovery (0.6); update discovery responses to remove unnecessary objections (0.4).	1.00	.50	390.00	195.00
05/21/19	Tyler R. Andrews	Coordinate production of current TOS/TOU and Merchant Terms from Groupon website to serve with amended responses (0.4); Develop strategy on [REDACTED]	1.60	.80	1,120.00	560.00
		[REDACTED] (0.7); Correspondence with client [REDACTED]				
		[REDACTED] (0.5).				
05/21/19	Megan L. Sheffield	Prepare files for production;	0.80	.40	208.00	104.00
05/21/19	Megan L. Sheffield	Prepare additional files for production;	0.50	.25	130.00	65.00
05/22/19	Tyler R. Andrews	Advise client on [REDACTED] (0.4); Prepare for pending 30b6 depositions (0.8)	1.20	.60	840.00	420.00
05/23/19	Tyler R. Andrews	Prepare and produce amended RFP responses and documents to opposing counsel.	1.50	.75	1,050.00	525.00
05/28/19	Tyler R. Andrews	Correspondence from opposing counsel	2.20	1.10	1,540.00	770.00

Invoice No.: 5111663
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

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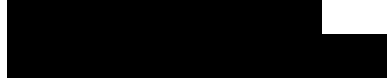
Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
05/28/19	VENDOR: Holo Discovery INVOICE#: 7389 DATE: 5/28/2019 Prepare PDFs for production	\$ 44.70
	Total Expenses:	<hr/> \$ 44.70



Invoice No.: 5112600
File No.: 156688.028600
Bill Date: July 3, 2019

Groupon, Inc.



Chicago, IL 211106

Attn:



INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through June 30, 2019:

Total Fees: \$ 14,420.00

Expenses:

Business Meals	124.42
Deposition/Court Reporters	753.50
Parking Charges	180.00
Transcript Charges	672.60
Travel and Lodging Out of Town	2,591.54

Total Expenses: \$ 4,322.06

Current Invoice: \$ 18,742.06

MKG:AC

Tax ID: 13-3613083

Invoice No.: 5112600
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>		<u>AMOUNT</u>	
06/02/19	Tyler R. Andrews	Prepare for deposition of Groupon online marketing and SEO expert in Seattle.	4.20	4.20	2,940.00	2,940.00
06/03/19	Tyler R. Andrews	Conduct defense of deposition of Groupon witness on online marketing and SEO trademark and metadata issues.	3.70	3.70	2,590.00	2,590.00
06/03/19	Tyler R. Andrews	Draft outline for pending opposition to anticipated supplemental filing by Plaintiff re trademark and dynamic pricing issues.	2.60	1.30	1,820.00	910.00
06/03/19	Tyler R. Andrews	Prepare for and conduct Pre-deposition meeting with Groupon witness Pankaj Kumar.	1.60	1.60	1,120.00	1,120.00
06/03/19	Mark E. Ferrario	Review incoming documents regarding depositions and next steps.	0.40	.20	280.00	140.00
06/04/19	Tyler R. Andrews	Summarize deposition issues and provide update to litigation team.	0.70	.35	490.00	245.00
06/04/19	Tyler R. Andrews	Finalize draft of introduction and outline of legal issues for pending response to Plaintiff's supplemental filings on Groupon trademark and pricing issues.	2.90	1.45	2,030.00	1,015.00
06/13/19	Tyler R. Andrews	Review exhibits to Conner and Kumar depositions.	0.40	.20	280.00	140.00
06/13/19	Tyler R. Andrews	Develop strategy (0.3); Review transcripts of Connor and Kumar deposition testimony (0.4)	0.70	.35	490.00	245.00
06/17/19	Tyler R. Andrews	Review deposition transcripts of Nate Conner and Pankaj Kumar (1.2); Submit same to client (0.2).	1.40	.70	980.00	490.00
06/26/19	Tyler R. Andrews	Develop strategy for (0.3); Correspondence with client re (0.2).	0.50	.25	350.00	175.00
06/28/19	Tyler R. Andrews	Correspondence with opposing counsel and prepare for meet and confer over dispute re Groupon 30(b)(6) trademark and metadata witness.	0.80	.80	560.00	560.00
			<u>Total Time:</u>			
			20.60		15.1	
			<u>Total Fees:</u>		\$ 14,420.00	
					\$10,570.00	

Invoice No.: 5112600
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 2

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
05/28/19	VENDOR: AirPlus International Inc - ACH INVOICE#: Z200125611 DATE: 6/3/2019 Tkt. No. 0167365223762 - Andrews/Tyler Ryan Air/Rail Travel on 05/29/2019: LAX ORD LAX	\$ 929.32
05/28/19	VENDOR: AirPlus International Inc - ACH INVOICE#: Z200125611 DATE: 6/3/2019 Tkt. No. 0167365223762 - Andrews/Tyler Ryan Air/Rail Travel on 05/29/2019: Travel agency service fee	\$ 6.00
05/28/19	VENDOR: Andrews, Tyler R. INVOICE#: 3411408706261100 DATE: 6/26/2019 Airfare; 05/28/19 - Attend trademark deposition	\$ 506.61
05/29/19	VENDOR: Andrews, Tyler R. INVOICE#: 3411377406261100 DATE: 6/26/2019 Dinner; 05/29/19 - Attend pricing deposition; Merchant: B Grill; Attendees: Tyler R. Andrews	\$ 36.10
05/30/19	VENDOR: Andrews, Tyler R. INVOICE#: 3411377406261100 DATE: 6/26/2019 Breakfast; 05/30/19 - Attend pricing deposition; Merchant: Virgin Wabash; Attendees: Tyler R. Andrews	\$ 30.09
05/30/19	VENDOR: Andrews, Tyler R. INVOICE#: 3411377406261100 DATE: 6/26/2019 Lunch; 05/30/19 - Attend pricing deposition; Merchant: Virgin Wabash; Attendees: Tyler R. Andrews	\$ 19.00
05/30/19	VENDOR: Andrews, Tyler R. INVOICE#: 3411377406261100 DATE: 6/26/2019 Car Service/Taxi; 05/30/19 - Attend pricing deposition	\$ 10.68
05/30/19	VENDOR: Andrews, Tyler R. INVOICE#: 3411377406261100 DATE: 6/26/2019 Car Service/Taxi; 05/30/19 - Attend pricing deposition	\$ 12.53
05/30/19	VENDOR: Andrews, Tyler R. INVOICE#: 3411377406261100 DATE: 6/26/2019 Car Service/Taxi; 05/30/19 - Attend pricing deposition	\$ 39.77
05/31/19	VENDOR: Andrews, Tyler R. INVOICE#: 3411377406261100 DATE: 6/26/2019 Car Service/Taxi; 05/31/19 - Attend pricing deposition	\$ 5.64
05/31/19	VENDOR: Andrews, Tyler R. INVOICE#: 3411377406261100 DATE: 6/26/2019 Lodging; 05/31/19 - Attend pricing deposition; Start Date 05/29/2019; End Date 05/31/2019	\$ 613.00
05/31/19	VENDOR: Andrews, Tyler R. INVOICE#: 3411377406261100 DATE: 6/26/2019 Car Service/Taxi; 05/31/19 - Attend pricing deposition	\$ 41.91
05/31/19	VENDOR: Andrews, Tyler R. INVOICE#: 3411377406261100 DATE: 6/26/2019 Change Ticket Fee; 05/31/19 - Attend pricing deposition	\$ 75.00
06/01/19	VENDOR: Andrews, Tyler R. INVOICE#: 3411377406261100 DATE: 6/26/2019 Parking; 06/01/19 - Attend pricing deposition	\$ 120.00
06/02/19	VENDOR: Andrews, Tyler R. INVOICE#: 3411408706261100 DATE: 6/26/2019 Car Service/Taxi; 06/02/19 - Attend trademark deposition	\$ 35.22
06/03/19	VENDOR: Andrews, Tyler R. INVOICE#: 3411408706261100 DATE: 6/26/2019 Breakfast; 06/03/19 - Attend trademark deposition; Merchant: Starbucks; Attendees: Tyler R. Andrews	\$ 8.81
06/03/19	VENDOR: Andrews, Tyler R. INVOICE#: 3411408706261100 DATE: 6/26/2019 Lunch; 06/03/19 - Attend trademark deposition; Merchant: Seattle Sports Page; Attendees: Tyler R. Andrews	\$ 30.42
06/03/19	VENDOR: Andrews, Tyler R. INVOICE#: 3411408706261100 DATE: 6/26/2019 Parking; 06/03/19 - Attend trademark deposition	\$ 60.00
06/03/19	VENDOR: Andrews, Tyler R. INVOICE#: 3411408706261100 DATE: 6/26/2019 Car Service/Taxi; 06/03/19 - Attend trademark deposition	\$ 31.77

Invoice No.: 5112600 Page 3
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

06/03/19	VENDOR: Andrews, Tyler R. INVOICE#: 3411408706261100 DATE: 6/26/2019 Lodging; 06/03/19 - Attend trademark deposition; Start Date 06/02/2019; End Date 06/03/2019	\$	284.09
06/13/19	VENDOR: Bridges Court Reporting LLC INVOICE#: 29604 DATE: 6/13/2019 Nate Conner deposition transcript; Net 45	\$	753.50
06/14/19	VENDOR: Litigation Services and Technologies INVOICE#: 1316758 DATE: 6/14/2019 Job No. 5417060 6/03/19 Transcript of 30(b)(6) Pankaj Kumar	\$	672.60
Total Expenses:		\$	4,322.06



Invoice No.: 5148414
File No. : 156688.028600
Bill Date : August 2, 2019

Groupon, Inc.

[REDACTED]
[REDACTED]

PO #211106
Chicago, IL

Attn: [REDACTED]
[REDACTED]

INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through July 31, 2019:

Total Fees: \$ 31,548.00

Current Invoice: \$ 31,548.00

Previous Balance (see attached statement): \$ [REDACTED]

Total Amount Due: \$ [REDACTED]

* * * * *

MKG:DK
Tax ID: 13-3613083

Invoice No.: 5148414
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/05/19	Tyler R. Andrews	Receive and review correspondence from opposing counsel regarding meet and confer request.	0.40	280.00
07/09/19	Tyler R. Andrews	Prepare for and conduct meet and confer call concerning allegedly unprepared 30(b)(6) witness (1.3); Receive and review motion for spoliation and sanctions against Groupon (0.8); Confer with client and B. Rabe re [REDACTED] (0.4).	2.50	1,750.00
07/09/19	Bethany L. Rabe	Evaluate motion for sanctions and develop strategy regarding response.	1.00	390.00
07/10/19	Tyler R. Andrews	Develop strategy on [REDACTED] [REDACTED].	2.20	1,540.00
07/10/19	Bethany L. Rabe	Continue researching and drafting opposition to motion for spoliation sanctions.	3.40	1,326.00
07/11/19	Tyler R. Andrews	Review and revise opposition to motion for sanctions against Groupon.	1.40	980.00
07/11/19	Bethany L. Rabe	Continue researching and drafting opposition to motion for spoliation sanctions.	2.90	1,131.00
07/12/19	Tyler R. Andrews	Prepare for and conduct conference call with client and M. Ferrario to discuss [REDACTED] [REDACTED] [REDACTED] (1.3); Analyze [REDACTED] [REDACTED] (0.8); Analyze [REDACTED] from client regarding [REDACTED] (0.8).	2.90	2,030.00
07/12/19	Bethany L. Rabe	Continue researching and drafting opposition to motion for sanctions, including adding in of transcript segments from deposition. [REDACTED] [REDACTED] [REDACTED]	4.80	1,872.00
07/15/19	Tyler R. Andrews	Review initial draft of opposition to sanctions and spoliation motion against Groupon (0.9); Review [REDACTED] regarding [REDACTED] [REDACTED] (0.4); Consult with client on [REDACTED] (0.6).	1.90	1,330.00
07/15/19	Bethany L. Rabe	Continue researching and drafting opposition to motion for sanctions.	6.60	2,574.00
07/16/19	Tyler R. Andrews	Finalize review and revisions to spoliation motion opposition and send same to client for review.	1.80	1,260.00
07/16/19	Bethany L. Rabe	Make revisions to opposition to motion for sanctions.	2.70	1,053.00
07/17/19	Tyler R. Andrews	Receive and conduct initial review of revisions from client to opposition.	0.80	560.00
07/19/19	Tyler R. Andrews	Correspondence with client on [REDACTED] [REDACTED]	0.60	420.00
07/19/19	Tyler R. Andrews	Outline declaration in support of opposition to	0.80	560.00

Invoice No.: 5148414
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 2

Description of Professional Services Rendered

		Spoliation motion (0.5); Confer on strategy for [REDACTED]		
		[REDACTED] (0.3).		
07/19/19	Bethany L. Rabe	Research issue of [REDACTED]	0.50	195.00
		[REDACTED]		
07/19/19	Bethany L. Rabe	Prepare declaration of T. Andrews in support of the opposition.	0.60	234.00
07/22/19	Tyler R. Andrews	Revise final draft of opposition to motion for spoliation and sanctions (2.7); Develop strategy for [REDACTED] with client and M. Ferrario (0.6).	3.30	2,310.00
07/23/19	Tyler R. Andrews	Finalize draft of opposition to motion for sanctions and spoliation.	3.90	2,730.00
07/23/19	Mark E. Ferrario	Review opposition to sanctions and spoliation motion.	0.90	630.00
07/23/19	Bethany L. Rabe	Incorporate client changes and make additional changes to opposition.	6.10	2,379.00
07/24/19	Tyler R. Andrews	Receive and review press inquiry on Groupon opposition and discuss [REDACTED] with client.	0.50	350.00
07/30/19	Tyler R. Andrews	Receive and review reply brief in support of sanctions motion filed by LV Skydiving (0.8); Update client with [REDACTED] (0.4)	1.20	840.00
07/30/19	Bethany L. Rabe	Review and evaluate reply brief in support of motion for sanctions from LV Skydiving.	0.30	117.00
<u>Total Time:</u>			56.80	54.00
<u>Total Fees:</u>				\$ 30,801.00 \$28,841.00

Invoice No.: 5148414
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

Page 3

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file



Invoice No.: 5168747
File No.: 156688.028600
Bill Date: September 4, 2019

Groupon, Inc.
[REDACTED]
[REDACTED]
PO# 211106
Chicago, IL

Attn: [REDACTED]
[REDACTED]

INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through August 31, 2019:

Total Fees: \$ 22,940.50

Expenses:

Business Meals	119.11
Parking Charges	30.00
Travel and Lodging Out of Town	567.00

Total Expenses: \$ 716.11

Current Invoice: \$ **23,656.61**

Previous Balance (see attached statement): \$ [REDACTED]

Total Amount Due: \$ [REDACTED]

* * * * *

MKG:DK
Tax ID: 13-3613083

Invoice No.: 5168747
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/02/19	Tyler R. Andrews	Review order setting hearing on sanctions motion (0.4); Begin initial preparation for hearing (0.4).	0.80	560.00
08/05/19	Tyler R. Andrews	Correspondence with client regarding [REDACTED]	0.40	280.00
08/06/19	Tyler R. Andrews	Prepare strategy for spoliation hearing arguments with (0.5); Continue strategy discussion with client [REDACTED] (0.4).	0.90	630.00
08/06/19	Bethany L. Rabe	Review reply brief re: sanctions in detail, including creating outline of arguments and evaluating whether there are any further steps needed.	2.00	780.00
08/07/19	Tyler R. Andrews	Confer with opposing counsel on available hearing dates (0.4); Analyze [REDACTED]	1.30	910.00
08/08/19	Tyler R. Andrews	[REDACTED] (0.6); Prepare hearing strategy (0.3). Continue conference with opposing counsel based on request for continuance and review proposed stipulation (0.7); Confer with client on [REDACTED] (0.4); Review briefing and begin outline of key arguments to present to Court (0.8).	1.90	1,330.00
08/09/19	Tyler R. Andrews	Review Plaintiff expert report and [REDACTED]	0.80	560.00
08/09/19	Bethany L. Rabe	Per T. Andrews, research [REDACTED]	1.60	624.00
08/12/19	Tyler R. Andrews	Further correspondence with client re strategy for hearing and expert retention (0.3); Continue outline and preparation for oral argument (1.2).	1.90	1,330.00
08/12/19	Hugo Hernandez-Diaz	Researched [REDACTED]	0.80	180.00
08/12/19	Bethany L. Rabe	Interview potential expert witness on metadata, follow-up regarding same.	0.70	273.00
08/13/19	Hugo Hernandez-Diaz	Researched [REDACTED]	2.60	585.00
08/14/19	Hugo Hernandez-Diaz	Continue researching [REDACTED]	0.90	202.50
08/15/19	Tyler R. Andrews	Continue review of briefing and analysis of arguments to present during argument of spoliation motion.	0.60	420.00
08/16/19	Tyler R. Andrews	Receive and review meet and confer demand from Plaintiff counsel regarding allegedly unprepared deposition topics (0.5); Review prior deposition topic requests and outline response to letter (0.7); Analyze arguments in	2.10	1,470.00

Invoice No.: 5168747
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 2

Description of Professional Services Rendered

		opposition to spoliation sanctions for pending hearing (0.9).		
08/16/19	Mark E. Ferrario	Review documents for upcoming hearing.	0.70	490.00
08/18/19	Tyler R. Andrews	Preparations outline of arguments for oral argument on Plaintiff's motion for spoliation sanctions.	4.50	3,150.00
08/19/19	Tyler R. Andrews	Review all pleadings and evidence related to sanctions motion (2.2); Complete final argument outline (1.8); Present mock arguments with litigation team (1.3); Attend and present argument before Court (1.4); Update client ██████████ (0.5).	7.20	5,040.00
08/19/19	Mark E. Ferrario	Review pleadings (0.9) and prepare for and attend hearing (1.4).	2.30	1,610.00
08/19/19	Bethany L. Rabe	Analyze mock arguments.	1.30	507.00
08/19/19	Bethany L. Rabe	Per T. Andrews, draft response to opposing counsel's meet and confer correspondence.	2.10	819.00
08/20/19	Tyler R. Andrews	Confer with opposing counsel in response to meet and confer demand over unprepared deponents.	0.50	350.00
08/21/19	Tyler R. Andrews	Receive and review order from Court denying Plaintiff's sanctions motion.	0.40	280.00
08/29/19	Tyler R. Andrews	Review correspondence from opposing counsel regarding meet and confer demand on allegedly unprepared witness representatives (0.4); Develop strategy and potential responses re ██████████ (0.4).	0.80	560.00
			<u>Total Time:</u>	39.10
			<u>Total Fees:</u>	\$ 22,940.50

Invoice No.: 5168747
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 3

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>		<u>AMOUNT</u>
08/15/19	VENDOR: Andrews, Tyler R. INVOICE#: 3573192408291135 DATE: 8/29/2019 Airfare; 08/15/19 - Attend Hearing on Pltfs Motion for Spoliation Sanctions & Sanctions	\$	338.00
08/18/19	VENDOR: Andrews, Tyler R. INVOICE#: 3573192408291135 DATE: 8/29/2019 Hotel - Dinner; 08/18/19 - Attend Hearing on Pltfs Motion for Spoliation Sanctions & Sanctions; Attendees: Tyler R. Andrews	\$	83.07
08/18/19	VENDOR: Andrews, Tyler R. INVOICE#: 3573192408291135 DATE: 8/29/2019 Car Service/Taxi; 08/18/19 - Attend Hearing on Pltfs Motion for Spoliation Sanctions & Sanctions	\$	16.20
08/19/19	VENDOR: Andrews, Tyler R. INVOICE#: 3573192408291135 DATE: 8/29/2019 Breakfast; 08/19/19 - Attend Hearing on Pltfs Motion for Spoliation Sanctions & Sanctions; Merchant: Jardin Restaurant; Attendees: Tyler R. Andrews	\$	36.04
08/19/19	VENDOR: Andrews, Tyler R. INVOICE#: 3573192408291135 DATE: 8/29/2019 Parking; 08/19/19 - Attend Hearing on Pltfs Motion for Spoliation Sanctions & Sanctions	\$	30.00
08/19/19	VENDOR: Andrews, Tyler R. INVOICE#: 3573192408291135 DATE: 8/29/2019 Lodging; 08/19/19 - Attend Hearing on Pltfs Motion for Spoliation Sanctions & Sanctions; Start Date 08/18/2019; End Date 08/19/2019	\$	197.28
08/19/19	VENDOR: Andrews, Tyler R. INVOICE#: 3573192408291135 DATE: 8/29/2019 Car Service/Taxi; 08/19/19 - Attend Hearing on Pltfs Motion for Spoliation Sanctions & Sanctions	\$	15.52
Total Expenses:		\$	716.11



Invoice No.: 5194165
File No.: 156688.028600
Bill Date: October 3, 2019

Groupon, Inc.

[REDACTED]
[REDACTED]

PO# 211106
Chicago, IL

Attn: [REDACTED]
[REDACTED]

INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through September 30, 2019:

Total Fees: \$ 10,440.00

Expenses:

Deposition/Court Reporters 207.10
Messenger/Courier Services 35.00

Total Expenses: \$ 242.10

Current Invoice: \$ **10,682.10**

Previous Balance (see attached statement): \$ [REDACTED]

Total Amount Due: \$ [REDACTED]

* * * * *

MKG:DK
Tax ID: 13-3613083

Invoice No.: 5194165
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/03/19	Tyler R. Andrews	Correspondence with opposing counsel regarding discovery meet and confer.	0.30	210.00
09/04/19	Tyler R. Andrews	Receive and conduct initial review of Plaintiff's motion objection to magistrate order (0.9); Correspondence with B. Rabe and develop strategy for response to objection (0.6)	1.50	1,050.00
09/05/19	Tyler R. Andrews	Strategy correspondence with client regarding [REDACTED] (0.6); Outline renewed demand for sanctions against Plaintiff (0.3).	0.90	630.00
09/06/19	Mark E. Ferrario	Telephone conference with Tyler Andrews; review motion.	0.80	560.00
09/06/19	Bethany L. Rabe	Review objection to Magistrate Judge ruling and begin developing strategy for response.	0.20	78.00
09/09/19	Tyler R. Andrews	Receive and review transcript of Magistrate Ferenbach's hearing on initial sanctions motion (0.8); Develop strategy and incorporate transcript arguments into draft objection response (0.4).	1.20	840.00
09/09/19	Bethany L. Rabe	Draft response in opposition to objection to magistrate judge's order per T. Andrews.	4.60	1,794.00
09/10/19	Tyler R. Andrews	Develop strategy on response to Plaintiff's objection (0.4); Prepare [REDACTED] for client (0.4).	0.80	560.00
09/10/19	Bethany L. Rabe	Update draft opposition to include arguments relating to court's oral ruling.	2.20	858.00
09/11/19	Tyler R. Andrews	Revise draft of response to Plaintiff's objection to magistrate order.	0.80	560.00
09/12/19	Tyler R. Andrews	Submit final draft of response to client for review and approval.	0.40	280.00
09/12/19	Bethany L. Rabe	Per T. Andrews, revise response to objection to magistrate judge's order.	1.20	468.00
09/17/19	Tyler R. Andrews	Revise response to Plaintiff's objection based on edits from client.	0.80	560.00
09/17/19	Bethany L. Rabe	Per T. Andrews, review client revisions and accept them; edit again for clarity and continuity.	0.50	195.00
09/18/19	Tyler R. Andrews	Final revisions to Groupon's response to Plaintiff's objection to Magistrate ruling and file wit US District Court.	2.00	1,400.00
09/18/19	Bethany L. Rabe	Per T. Andrews, perform final review of response before filing.	0.30	117.00
09/20/19	Tyler R. Andrews	Advise client regarding [REDACTED]	0.40	280.00
			<u>Total Time:</u>	18.90
			<u>Total Fees:</u>	\$ 10,440.00

Invoice No.: 5194165
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

Page 2

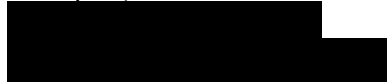
Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>		<u>AMOUNT</u>
09/05/19	VENDOR: Newman, Heather K. INVOICE#: 20190074 DATE: 9/5/2019 Expedite transcript of 8/19/19 hearing	\$	207.10
09/06/19	VENDOR: Nationwide Legal, LLC - 4527 INVOICE#: 00000011882 DATE: 9/15/2019 Trk'ing No. NV198675: Rush Filing - 3 Hrs to United States District Court District Of Nevada on 9/06/19 Req.'d by Andrea Rosehill - Ref. 156688.0286 (Please Make This Payment Today At The Cashier'S Office - Thanks)	\$	35.00
Total Expenses:		\$	242.10



Invoice No.: 5227351
File No. : 156688.028600
Bill Date : November 2, 2019

Groupon, Inc.



Chicago, IL 211106

Attn:



INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through October 31, 2019:

Total Fees:	\$	5,106.00
Current Invoice:	\$	<u>5,106.00</u>

MKG:AC

Tax ID: 13-3613083

Invoice No.: 5227351
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/07/19	Tyler R. Andrews	Prepare for meet and confer call with opposing counsel on discovery issues.	0.60	420.00
10/08/19	Tyler R. Andrews	Continue preparations for meet and confer call on discovery issues (0.3); Review prior deposition transcripts and demand letters (0.3); Correspondence with opposing counsel regarding same (0.2).	0.80	560.00
10/08/19	Bethany L. Rabe	Per T. Andrews, review email from opposing counsel re: meet and confer conference and evaluate topics on which opposing counsel claims we were not prepared (0.8); prepare summary for T. Andrews' use in meet and confer conference (1.1).	1.90	741.00
10/11/19	Tyler R. Andrews	Prepare for and conduct meet-and-confer call with opposing counsel (0.3); Review and approve stipulation regarding stay of discovery dispute until ruling on motion to dismiss (0.2).	0.50	350.00
10/14/19	Tyler R. Andrews	Confer with opposing counsel regarding discovery disputes and status of stay pending motion to dismiss order.	0.30	210.00
10/16/19	Tyler R. Andrews	Correspondence with opposing counsel regarding deposition disputes and agreement to stay same.	0.30	210.00
10/24/19	Tyler R. Andrews	Receive and review order from District Court granting in part client's motion to dismiss (0.8); Draft status update to client (0.4); Develop strategy for next steps (0.4).	1.60	1,120.00
10/24/19	Mark E. Ferrario	Review order (0.2); follow up with client regarding next steps (0.2).	0.40	280.00
10/28/19	Tyler R. Andrews	Develop strategy for remaining trademark claims (0.5); Outline answer and affirmative defenses to remaining claims (0.4).	0.90	630.00
10/31/19	Bethany L. Rabe	Draft answer per T. Andrews.	1.50	585.00
			<u>Total Time:</u>	8.80
			<u>Total Fees:</u>	\$ 5,106.00

Invoice No.: 5227351
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

Page 2

Description of Expenses Billed:

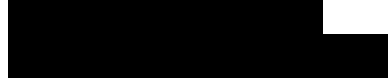
<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file



Invoice No.: 5260800
File No.: 156688.028600
Bill Date: December 4, 2019

Groupon, Inc.



Chicago, IL 211106

Attn:



INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through November 30, 2019:

Total Fees:	\$	5,544.00
Current Invoice:	\$	<u>5,544.00</u>

MKG:AC

Tax ID: 13-3613083

Invoice No.: 5260800
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
11/01/19	Tyler R. Andrews	Research [REDACTED] after antitrust dismissal (0.6); Corresponding with client re [REDACTED] (0.2); Complete revisions to draft answer and affirmative defenses (0.6); Prepare for strategy conference call with client on all pending issues (0.4).	1.80	1,260.00
11/01/19	Bethany L. Rabe	Research of local rule to determine [REDACTED] [REDACTED]	0.40	156.00
11/02/19	Bethany L. Rabe	Revise answer to include paragraphs from the complaint and response paragraphs in one document.	0.40	156.00
11/04/19	Tyler R. Andrews	Conduct strategy conference call with client (0.8); Begin draft of initial disclosure forms and discovery requests to Plaintiff on Trademark claims (0.7).	1.50	1,050.00
11/06/19	Tyler R. Andrews	Revise answer and affirmative defenses per client instructions.	0.60	420.00
11/08/19	Megan L. Sheffield	Draft initial disclosures;	0.90	234.00
11/19/19	Bethany L. Rabe	Work on discovery requests to plaintiff.	0.60	234.00
11/20/19	Tyler R. Andrews	Review final draft of initial disclosures and discovery requests to Plaintiff.	0.50	350.00
11/20/19	Bethany L. Rabe	Work on discovery requests to Las Vegas Skydiving Adventures.	1.60	624.00
11/23/19	Tyler R. Andrews	Review correspondence on first set of complete discovery requests to Plaintiff.	0.40	280.00
11/23/19	Bethany L. Rabe	Revise discovery requests.	2.00	780.00
<u>Total Time:</u>			10.70	
<u>Total Fees:</u>				\$ 5,544.00

Invoice No.: 5260800
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

Page 2

Description of Expenses Billed:

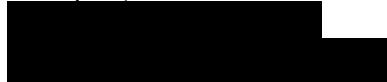
<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file



Invoice No.: 5280722
File No. : 156688.028600
Bill Date : January 21, 2020

Groupon, Inc.



Chicago, IL 211106

Attn:



INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through December 31, 2019:

Total Fees:	\$	3,640.00
Current Invoice:	\$	<u>3,640.00</u>

MKG:AC

Tax ID: 13-3613083

Invoice No.: 5280722
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/10/19	Tyler R. Andrews	Review proposed discovery plan from opposing counsel (0.4); Develop strategy for response to same with (0.5).	0.90	630.00
12/11/19	Tyler R. Andrews	Correspondence with client on [REDACTED] (0.5); Revise and finalize new set of disclosures and draft discovery on Plaintiff (0.8).	1.30	910.00
12/12/19	Tyler R. Andrews	Correspondence with client on [REDACTED]	0.30	210.00
12/12/19	Mark E. Ferrario	Review incoming documents.	0.30	210.00
12/16/19	Tyler R. Andrews	Revise joint status report with Groupon's positions (0.5); Note errors in Plaintiff's position statements and develop strategy on response to same (0.5).	1.00	700.00
12/18/19	Tyler R. Andrews	Correspondence with opposing counsel regarding discovery issues (0.3); Finalize joint status report with client input (0.6)	0.90	630.00
12/30/19	Tyler R. Andrews	Review discovery order and prepare for hearing (0.3); Correspondence with client re [REDACTED] (0.2).	0.50	350.00
			<u>Total Time:</u>	5.20
			<u>Total Fees:</u>	\$ 3,640.00

Invoice No.: 5280722
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

Page 2

Description of Expenses Billed:

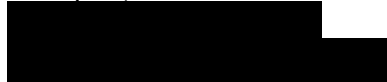
<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file



Invoice No.: 5306267
File No. : 156688.028600
Bill Date : February 24, 2020

Groupon, Inc.



Chicago, IL 211106

Attn:



INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through January 31, 2020:

Total Fees:	\$	14,574.00
Current Invoice:	\$	<u>14,574.00</u>

MKG:AC

Tax ID: 13-3613083

Invoice No.: 5306267
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/02/20	Tyler R. Andrews	Review motion for reconsideration filed by Plaintiff (0.9); Begin outline of opposition to reconsideration motion (0.6)	1.50	1,050.00
01/02/20	Bethany L. Rabe	Begin drafting opposition to Plaintiff's motion for reconsideration.	2.40	936.00
01/03/20	Tyler R. Andrews	Develop strategy with client re [REDACTED] (0.6); Conduct research on [REDACTED] (0.5).	1.10	770.00
01/03/20	Hugo Hernandez-Diaz	Research federal cases within 9th Circuit dealing with [REDACTED]	0.40	100.00
01/06/20	Tyler R. Andrews	Call with client on [REDACTED] (0.9); Conduct additional research on [REDACTED] (0.6).	1.50	1,050.00
01/06/20	Hugo Hernandez-Diaz	Research federal cases within 9th Circuit dealing with [REDACTED]	1.20	300.00
01/07/20	Tyler R. Andrews	Devlop strategy for opposition to motion for reconsideration.	0.30	210.00
01/07/20	Bethany L. Rabe	Work on opposition to motion for reconsideration.	1.40	546.00
01/08/20	Tyler R. Andrews	Draft substantive opposition to reconsideration motion based on prior Court order dismissing antitrust claims (1.1); Outline similarities between Plaintiff's opposition to MTD and Plaintiff's reconsideration motion (0.5).	1.60	1,120.00
01/09/20	Tyler R. Andrews	Draft demand to opposing counsel to retract reconsideration motion or face sanctions (0.4); Continue draft of opposition to motion (0.6).	1.00	700.00
01/09/20	Bethany L. Rabe	Work on opposition to motion for reconsideration.	2.90	1,131.00
01/13/20	Tyler R. Andrews	Draft opposition to Plaintiff's motion for reconsideration and submit to client (1.8); Prepare for hearing on discovery issues before Judge Ferenbach (0.6).	2.40	1,680.00
01/14/20	Tyler R. Andrews	Review proposed discovery plans and prepare for hearing before Judge Ferenbach (0.5); Receive and review additional documents produced by LV Skydiving in discovery (0.6); Review and revise declaration in support of motion for reconsideration (0.3).	1.40	980.00
01/14/20	Bethany L. Rabe	Evaluate documents produced.	0.40	156.00
01/15/20	Tyler R. Andrews	Final preparations for discovery and status hearing before Judge Ferenbach (1.0); Conduct hearing and present positions to Court (1.0); Update client with status and strategy (0.5).	2.50	1,750.00
01/15/20	Bethany L. Rabe	Attend hearing on discovery schedule; make client edits to opposition to motion for	2.00	780.00

Invoice No.: 5306267
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 2

		reconsideration.		
01/16/20	Tyler R. Andrews	Finalize opposition to reconsideration motion.	0.40	280.00
01/21/20	Tyler R. Andrews	Draft status report.	0.40	280.00
01/23/20	Tyler R. Andrews	Review reply in support of motion for reconsideration and outline arguments for pending hearing (0.6); Advise client of filing and develop strategy (0.2).	0.80	560.00
01/31/20	Bethany L. Rabe	Review initial disclosure draft and begin reviewing documents disclosed by LV Skydiving in their initial disclosures in preparation for [REDACTED]	0.50	195.00

<u>Total Time:</u>	26.10	
<u>Total Fees:</u>		\$ 14,574.00

Invoice No.: 5306267
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

Page 3

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file



Invoice No. : 5326850
File No. : 156688.028600
Bill Date : March 3, 2020

Groupon, Inc.
[REDACTED]
[REDACTED]
Chicago, IL 211106

Attn: [REDACTED]
[REDACTED]

INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through February 29, 2020:

Total Fees: \$ 9,947.00

Expenses:

UPS Charges

11.56

Total Expenses: \$ 11.56

Current Invoice: \$ 9,958.56

Previous Balance (see attached statement): \$ [REDACTED]

Total Amount Due: \$ [REDACTED]

MKG:DK
Tax ID: 13-3613083

Invoice No.: 5326850
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/03/20	Bethany L. Rabe	Create summary of documents that have been produced by LV Skydiving.	0.50	195.00
02/05/20	Tyler R. Andrews	Review and revise draft discovery demands on LV Skydiving (0.4); Prepare for comprehensive status and strategy discussion with client (0.4).	0.80	560.00
02/10/20	Tyler R. Andrews	Review notice of executive depositions from opposing counsel (0.3); Research [REDACTED] (0.4); Update client with [REDACTED] (0.5).	1.20	840.00
02/11/20	Tyler R. Andrews	Review research on [REDACTED] (0.5); Review disclosed documents and testimony for [REDACTED] (0.3).	0.80	560.00
02/11/20	Bethany L. Rabe	Attention to apex depositions issue, namely, search files for previous motions on this issue to more efficiently address current deposition threats from opposing counsel.	0.80	312.00
02/12/20	Tyler R. Andrews	Conduct strategy conference call with client (0.8); Review new documents and emails produced by Plaintiff (0.5); Further prepare strategy for all pending discovery issues (0.5).	1.80	1,260.00
02/12/20	Bethany L. Rabe	Research into [REDACTED] [REDACTED] [REDACTED]	0.90	351.00
02/13/20	Tyler R. Andrews	Correspondence with opposing counsel regarding objections to planned depositions of Groupon executives.	0.80	560.00
02/13/20	Mark E. Ferrario	Review incoming documents regarding deposition request.	0.20	140.00
02/13/20	Cynthia Lott	Retrieve Bloomberg Dockets and Lexis Advance Cases where [REDACTED] [REDACTED] [REDACTED] [REDACTED]	0.60	132.00
02/14/20	Tyler R. Andrews	Follow up correspondence with opposing counsel concerning improper notices of Groupon executives for deposition.	0.30	210.00
02/17/20	Tyler R. Andrews	Confer with client on deposition notices and motion to quash.	0.40	280.00
02/19/20	Tyler R. Andrews	Review additional deposition notices from Plaintiff (0.4); Correspondence with client on [REDACTED] (0.3); Outline motion for protective order (0.4); Research [REDACTED] (0.3).	1.40	980.00
02/24/20	Tyler R. Andrews	Receive and review new discovery requests from Plaintiff (0.4); Email to client re same (0.2).	0.60	420.00
02/25/20	Tyler R. Andrews	Review new notices of deposition (0.3); Continue outlining motion for protective order re same (0.3).	0.60	420.00

Invoice No.: 5326850
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 2

02/26/20	Tyler R. Andrews	Draft of motion for protective order (0.8); Review all pending discovery requests and initial disclosures for service (0.5); Research [REDACTED] (0.2)	1.50	1,050.00
02/26/20	Bethany L. Rabe	Draft motion for protective order.	3.10	1,209.00
02/27/20	Bethany L. Rabe	Finish drafting motion for protective order and declaration shells in support of the same.	1.20	468.00
			<hr/>	
			<u>Total Time:</u>	17.50
			<u>Total Fees:</u>	\$ 9,947.00

Invoice No.: 5326850
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

Page 3

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
01/21/20	VENDOR: United Parcel Service, Inc.(UPS) - ACH INVOICE#: 00012520287 DATE: 1/25/2020 Trk'ing No. 1ZE0W1430196511534 / Next Day Air Commercial from Greenberg Traurig - Orange County Tyler R. Andrews to Carolyn C. Phillips, Esq. Law Offices Of Carol on 1/21/2020 - 156688.028600	\$ 11.56
Total Expenses:		\$ 11.56



Invoice No. : 5353573
File No. : 156688.028600
Bill Date : April 2, 2020

Groupon, Inc.
[REDACTED]
[REDACTED]
Chicago, IL 211106

Attn: [REDACTED]
[REDACTED]

INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through March 31, 2020:

Total Fees: \$ 17,899.00

Current Invoice: \$ 17,899.00

Previous Balance (see attached statement): \$ [REDACTED]

Total Amount Due: \$ [REDACTED]

MKG:DK
Tax ID: 13-3613083

Invoice No.: 5353573
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

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Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/02/20	Tyler R. Andrews	Prepare for call with client on [REDACTED] [REDACTED] (0.4); Analyze [REDACTED] [REDACTED] (0.4).	0.80	560.00
03/03/20	Tyler R. Andrews	Conduct strategy and status call with client on [REDACTED] (0.8); Revise motion for protective order on Goodall and Belmont depositions (0.7); Draft discovery to propound on Plaintiff (0.4).	1.90	1,330.00
03/03/20	Cynthia L. Ney	Preparation of shell responses to requests for production of documents and requests for interrogatories by Las Vegas Skydiving Adventure.	1.60	472.00
03/03/20	Bethany L. Rabe	Per T. Andrews, begin drafting substantive responses to discovery served on Groupon by Plaintiff.	1.50	585.00
03/04/20	Tyler R. Andrews	Revise objections and responses to discovery requests served on Groupon.	0.50	350.00
03/04/20	Bethany L. Rabe	Per T. Andrews, revise discovery responses and objections.	1.20	468.00
03/06/20	Bethany L. Rabe	Research issues relating to [REDACTED] [REDACTED] [REDACTED]	0.50	195.00
03/10/20	Tyler R. Andrews	Develop strategy with client on [REDACTED] [REDACTED] (0.5); Revise responses and objections to Plaintiff's second set of discovery requests to Groupon (0.5);	1.00	700.00
03/11/20	Tyler R. Andrews	Correspondence with opposing counsel regarding motion for protective order on Belmont/Goodall depositions and objections to 30b6 notices.	0.40	280.00
03/12/20	Tyler R. Andrews	Correspondence re client's edits to protective order motion (0.3); Revise supporting declarations for Goodall and Belmont (0.4).	0.70	490.00
03/12/20	Bethany L. Rabe	Review client changes to motion for protective order (0.1); update declarations of executives to reflect client changes (0.2).	0.30	117.00
03/13/20	Tyler R. Andrews	Correspondence with client on [REDACTED] [REDACTED] (0.2); Begin draft of objections and responses to pending discovery requests (0.3); Draft response to opposing counsel rejecting request to extend all deadlines and proposing alternative plan (0.3).	0.80	560.00
03/13/20	Bethany L. Rabe	Per T. Andrews, draft objections to 30(b)(6) deposition notice.	1.30	507.00
03/16/20	Tyler R. Andrews	Prepare for meet and confer call with opposing counsel (0.3); Review client edits to protective order motion (0.3); Develop strategy on pending declarations and status report for Court (0.4).	1.00	700.00
03/16/20	Bethany L. Rabe	Draft T. Andrews declaration in support of motion for protective order.	0.60	234.00

Invoice No.: 5353573
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 2

03/17/20	Tyler R. Andrews	Review new deposition notices of Groupon executives and 30b6 witnesses (0.4); Continued meet and confer correspondence with opposing counsel (0.4).	0.80	560.00
03/17/20	Bethany L. Rabe	Review plaintiff's draft of status report.	0.20	78.00
03/18/20	Tyler R. Andrews	Prepare for and conduct meet and confer call with opposing counsel (0.8); Draft Groupon portions of status report (0.4); Outline Stipulation details for proposed extension (0.2); Revise all pending discovery drafts (0.5).	1.90	1,330.00
03/18/20	Bethany L. Rabe	Develop discussion points for conference with opposing counsel.	0.20	78.00
03/19/20	Tyler R. Andrews	Correspondence with client on [REDACTED] [REDACTED] (0.4); Correspondence with opposing counsel on status report to Court and discovery extensions (0.5); Receive and review expert witness designations from Plaintiff (0.5).	1.40	980.00
03/20/20	Tyler R. Andrews	Call with client to discuss [REDACTED] (0.4); Review [REDACTED] from client pertaining to [REDACTED] (0.4); Finalize all discovery requests and deposition notices on Plaintiff (0.7); Draft response to opposing counsel (0.3).	1.80	1,260.00
03/20/20	Cynthia L. Ney	Preparation of notice of depositions (0.5); editing of initial disclosures, requests for production of documents, request for interrogatories and request for admissions (1.0).	1.50	442.50
03/20/20	Bethany L. Rabe	Finalize discovery responses by incorporating client changes (0.3); Draft topics for 30(b)(6) deposition (1.7)	1.90	741.00
03/21/20	Tyler R. Andrews	Review draft of motion to extend discovery from client (0.4); Correspondence on deposition and served discovery with client (0.3).	0.70	490.00
03/21/20	Bethany L. Rabe	Develop strategy relating to discovery extension or pause (0.3); Review client motion (0.2).	0.50	195.00
03/23/20	Tyler R. Andrews	Revise draft motion for extension of discovery and add emergency hearing provisions (0.6); Correspondence with opposing counsel on pending discovery issues (0.4); Revise objections to Plaintiff's discovery for service (0.3)	1.30	910.00
03/23/20	Bethany L. Rabe	Review and finalize motion for discovery extension/pause, including changes to comply with local rules (0.9); prepare T. Andrews declaration in support of the same (0.6).	1.50	585.00
03/24/20	Tyler R. Andrews	Develop strategy on [REDACTED] [REDACTED].	0.40	280.00
03/24/20	Mark E. Ferrario	Review court order (0.1); follow up with client re same (0.2).	0.30	210.00
03/25/20	Tyler R. Andrews	Finalize discovery responses and objections (0.4); Receive and review opposition to Groupon motion filed by Plaintiff (0.4).	0.80	560.00
03/25/20	Cynthia L. Ney	Finalize responses to requests for production of	0.50	147.50

Invoice No.: 5353573
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 3

03/26/20	Bethany L. Rabe	documents and request for interrogatories. Review opposition brief to motion for discovery extension (0.5); Draft reply to same (1.4).	1.90	741.00
03/27/20	Tyler R. Andrews	Revise reply in support of motion to extend (0.5); Draft update to client on [REDACTED] [REDACTED] (0.2).	0.70	490.00
03/30/20	Bethany L. Rabe	Revise reply brief per client instructions.	0.70	273.00
			<u>Total Time:</u>	33.10
			<u>Total Fees:</u>	\$ 17,899.00

Invoice No.: 5353573
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file



Invoice No.: 5373372
File No. : 156688.028600
Bill Date : May 7, 2020

Groupon, Inc.



Chicago, IL 211106

Attn:



INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through April 30, 2020:

Total Fees:	\$	10,988.00
Current Invoice:	\$	<u>10,988.00</u>

MKG:DL

Tax ID: 13-3613083

Invoice No.: 5373372
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/01/20	Tyler R. Andrews	Finalize reply in support of motion to extend discovery (0.4); Finalize motion for protective order (0.4) Draft summary and submit motions to client for review (0.3).	1.10	770.00
04/06/20	Tyler R. Andrews	Review correspondence from client (0.2); Research [REDACTED] (0.4).	0.60	420.00
04/07/20	Tyler R. Andrews	Research into [REDACTED]	0.50	350.00
04/09/20	Tyler R. Andrews	Review reply of Las Vegas Skydiving in support of extra discovery extension (0.4); Prepare for hearing on same (0.3).	0.70	490.00
04/10/20	Tyler R. Andrews	Conduct interview of rebuttal expert on [REDACTED]	0.70	490.00
04/13/20	Tyler R. Andrews	Prepare for hearing on discovery issues (0.5); Conduct hearing before Magistrate Ferenbach (0.5); Develop strategy regarding [REDACTED] (0.4).	1.40	980.00
04/13/20	Bethany L. Rabe	Prepare outline for hearing (.6); draft proposed order extending discovery deadlines (1.0).	1.60	624.00
04/15/20	Tyler R. Andrews	Receive and review proposed scheduling plan from opposing counsel (0.3); Draft revisions to plan and submit (0.4); Prepare for meet and confer re same (0.3).	1.00	700.00
04/17/20	Tyler R. Andrews	Conduct meet and confer with LVS counsel on all pending discovery disputes and scheduling (0.8). Multiple back-and-forth correspondence with counsel on expert report and related deadlines (0.3).	1.10	770.00
04/17/20	Mark E. Ferrario	Review incoming documents regarding pending discovery dispute.	0.40	280.00
04/20/20	Tyler R. Andrews	Multiple meet and confer correspondence with opposing counsel on discovery disputes (1.4); Correspondence with client on [REDACTED] (0.5); Draft individual discovery plan for submission to Court (0.8); Review Plaintiff initial expert report (0.5); Continue research into [REDACTED] (0.4).	3.60	2,520.00
04/20/20	Mark E. Ferrario	Review incoming documents.	0.40	280.00
04/20/20	Bethany L. Rabe	Per T. Andrews, create individual 26(f) report for filing in the event that the parties cannot agree (2.5); make updates to the joint report (.8); draft proposed stipulation to extend discovery plan (.3).	3.60	1,404.00
04/21/20	Tyler R. Andrews	Review filings by LVS pursuant to ongoing discovery dispute over expert disclosures and scheduling (0.3); Continue correspondence with proposed rebuttal expert [REDACTED]	1.10	770.00

Invoice No.: 5373372
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 2

		<div style="background-color: black; width: 200px; height: 1.2em; margin-bottom: 0.2em;"></div> (0.4); Receive and analyze order from Court rejecting LVS plan and granting Groupon's proposed plan (0.2); Update client with <div style="background-color: black; width: 120px; height: 1.2em; display: inline-block;"></div> <div style="background-color: black; width: 160px; height: 1.2em; display: inline-block;"></div> (0.2).		
04/21/20	Mark E. Ferrario	Review court discovery plan.	0.20	140.00
			<u>Total Time:</u>	18.00
			<u>Total Fees:</u>	\$ 10,988.00

Invoice No.: 5373372
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

Page 3

Description of Expenses Billed:

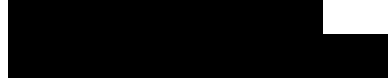
<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file



Invoice No.: 5398887
File No. : 156688.028600
Bill Date : June 2, 2020

Groupon, Inc.



Chicago, IL 211106

Attn:



INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through May 31, 2020:

Total Fees:	\$	210.00
Current Invoice:	\$	<u>210.00</u>

MKG:AC

Tax ID: 13-3613083

Invoice No.: 5398887
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/04/20	Tyler R. Andrews	Research [REDACTED] [REDACTED] given Court's revised scheduling order.	0.30	210.00
			<hr/>	
			<u>Total Time:</u>	0.30
			<u>Total Fees:</u>	\$ 210.00

Invoice No.: 5398887
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

Page 2

Description of Expenses Billed:

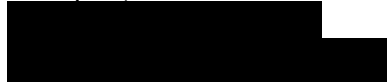
<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file



Invoice No.: 5425492
File No. : 156688.028600
Bill Date : July 1, 2020

Groupon, Inc.



Chicago, IL 211106

Attn:



INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through June 30, 2020:

Total Fees:	\$	1,050.00
Current Invoice:	\$	<u>1,050.00</u>

MKG:AC

Tax ID: 13-3613083

Invoice No.: 5425492
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/02/20	Tyler R. Andrews	Receive filing from opposing counsel with changed firm information and research same (0.2); Develop strategy on [REDACTED] (0.5).	0.70	490.00
06/04/20	Tyler R. Andrews	Research on [REDACTED] (0.3); Outline all follow-up discovery needed per lift of stay (0.2).	0.50	350.00
06/26/20	Tyler R. Andrews	Outline strategy on [REDACTED]	0.30	210.00
			<u>Total Time:</u>	1.50
			<u>Total Fees:</u>	\$ 1,050.00

Invoice No.: 5425492
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

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Description of Expenses Billed:

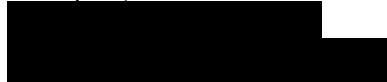
<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file



Invoice No.: 5455196
File No. : 156688.028600
Bill Date : August 4, 2020

Groupon, Inc.



Chicago, IL 211106

Attn:



INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through July 31, 2020:

Total Fees:	\$	18,412.00
Current Invoice:	\$	<u>18,412.00</u>

MKG:AC

Tax ID: 13-3613083

Invoice No.: 5455196
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/02/20	Tyler R. Andrews	Develop strategy for objection to new 30b6 deposition notice from Plaintiff (0.3); Confer with client regarding [REDACTED] (0.3).	0.60	420.00
07/06/20	Tyler R. Andrews	Review order from Court denying Plaintiff motion for reconsideration and develop strategy re same.	0.20	140.00
07/07/20	Tyler R. Andrews	Draft comprehensive status and strategy update for client (0.6); Confer with client on [REDACTED] (0.3).	0.90	630.00
07/07/20	Bethany L. Rabe	Revise declarations and motion for protective order in preparation for updating and filing.	0.30	117.00
07/08/20	Tyler R. Andrews	Correspondence with computer data rebuttal expert re: [REDACTED] (0.4); Review strategy and declarations needed for protective order motion against executive depositions (0.4).	0.80	560.00
07/09/20	Tyler R. Andrews	Confer with opposing counsel on deposition issues and discovery schedule (0.4); Outline revisions to protective order motion (0.3).	0.70	490.00
07/09/20	Bethany L. Rabe	Begin updating motion for protective order to account for recent events and new argument by Plaintiff.	0.50	195.00
07/10/20	Tyler R. Andrews	Receive and review amended notices of deposition of Belmont and Goodall from Plaintiff (0.1); Review updated draft of protective order motion and add declaration information (0.3); Review list of discovery requests to compel from Plaintiff and demand responses to same (0.4); Continued correspondence with proposed Groupon rebuttal expert and set up client call with same (0.3); Revise protective order motion draft and send to client for review (0.3).	1.40	980.00
07/10/20	Bethany L. Rabe	Continue updating motion for protective order and related declarations (1.1); review discovery requests and prior correspondence and filings to determine whether [REDACTED] (.9).	2.00	780.00
07/13/20	Tyler R. Andrews	Conference call with proposed rebuttal data expert and client (0.7); Correspondence with expert and send materials for review (0.4); Review client revisions to motion for protective order and finalize (0.7); Research [REDACTED] (0.3); Revise and circulated amended discovery responses to client (0.3).	2.40	1,680.00
07/13/20	Bethany L. Rabe	Continue updating motion for protective order with client edits and new declaration (.5); draft	1.50	585.00

Invoice No.: 5455196
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 2

		T. Andrews declaration and prepare exhibits (.5); review case law on [REDACTED] (.5).		
07/14/20	Tyler R. Andrews	Finalize declaration for motion to protective order (0.3); Final revisions to motion for protective order and prepare for filing (0.3); Correspondence with rebuttal computer expert and review proposed budget and retention documents (0.4).	1.00	700.00
07/14/20	Bethany L. Rabe	Revise declaration and protective order motion.	0.30	117.00
07/15/20	Tyler R. Andrews	Finalize motion for protective order and all attachments (0.4); Develop strategy on rebuttal expert disclosure (0.2); Outline topics and dates for notices of Plaintiff depositions (0.3); Receive and review LVS responses to Groupon's discovery requests (0.2).	1.10	770.00
07/16/20	Tyler R. Andrews	Outline grounds for motion to compel based on discovery responses from Plaintiff (0.4); Research on [REDACTED] (0.3).	0.70	490.00
07/16/20	Bethany L. Rabe	Review incoming discovery.	0.70	273.00
07/21/20	Tyler R. Andrews	Review discovery documents and interrogatory responses produced by Plaintiff (0.8); Develop strategy for rebuttal expert disclosures (0.5); Correspondence with opposing counsel regarding noticed depositions (0.3); Comprehensive status and strategy update for client (0.6); Conduct research on [REDACTED] (0.4); Review deposition transcripts and documents in record for [REDACTED] (0.3).	2.90	2,030.00
07/21/20	Bethany L. Rabe	Research expert rules per T. Andrews (.2); review depositions to determine [REDACTED] (.3); review new document production (.4).	0.90	351.00
07/21/20	Megan L. Sheffield	Research background on witnesses recently noticed for deposition;	0.50	130.00
07/22/20	Tyler R. Andrews	Correspondence with rebuttal expert Josh Moulin and provide additional resources and documents (0.6); Research [REDACTED] (0.3); Outline deposition notice topics for Las Vegas Skydiving representative and expert (0.3).	1.20	840.00
07/23/20	Tyler R. Andrews	Correspondence with expert witness regarding draft report (0.4); Research confidentiality and AEO designations on Plaintiff disclosed additional documents (0.3).	0.70	490.00
07/24/20	Tyler R. Andrews	Correspondence with opposing counsel on proposed discovery schedule and depositions (0.4); Review pending 30(b)(6) designation deadline for Groupon (0.2).	0.60	420.00
07/28/20	Tyler R. Andrews	Prepare for and conduct zoom call with client technical department and rebuttal expert (0.6); Receive and revise proposed objections to Plaintiff 30(b)(6) notices (0.3); Confer with	1.10	770.00

Invoice No.: 5455196
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 3

		opposing counsel on video deposition request and proposed extension (0.2).		
07/28/20	Bethany L. Rabe	Draft objections to 30(b)(6) deposition topics.	0.70	273.00
07/29/20	Tyler R. Andrews	Revise deposition objections (0.3); Review LVS opposition to protective order and outline points for reply brief to same (0.4); Correspondence with client regarding [REDACTED]	1.30	910.00
		(0.4); Correspondence with Josh Moulin regarding [REDACTED] (0.2).		
07/29/20	Bethany L. Rabe	Update objections (.5); research on [REDACTED] (1.0); research on [REDACTED] (.2); create shell for reply brief (.1).	1.80	702.00
07/30/20	Tyler R. Andrews	Correspondence and research regarding [REDACTED] (0.4); Draft list to client of [REDACTED] (0.4).	0.80	560.00
07/30/20	Cynthia L. Ney	Preparation of expert witness disclosure.	0.50	130.00
07/30/20	Bethany L. Rabe	Draft reply in support of motion for protective order.	4.10	1,599.00
			<hr/>	
			<u>Total Time:</u>	32.20
			<u>Total Fees:</u>	\$ 18,132.00

Invoice No.: 5455196
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file



Invoice No. : 5475910
File No. : 156688.028600
Bill Date : September 1, 2020

Groupon, Inc.
[REDACTED]
[REDACTED]
Chicago, IL 211106

Attn: [REDACTED]
[REDACTED]

INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through August 31, 2020:

Total Fees: \$ 14,654.50

Current Invoice: \$ 14,654.50

Previous Balance (see attached statement): \$ [REDACTED]

Total Amount Due: \$ [REDACTED]

MKG:DK
Tax ID: 13-3613083

Invoice No.: 5475910
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
08/01/20	Tyler R. Andrews	Receive and review notices continuing Plaintiff's noticed depositions of Belmont, Goodall, and 30b6 (0.3); Advise client of [REDACTED] (0.4).	0.70	490.00
08/03/20	Tyler R. Andrews	Review final draft of rebuttal expert report (0.9); Develop strategy for [REDACTED] (0.8); Revise 30b6 deposition notice and serve (0.5); Confer regarding expert strategy and issues to include in report (0.3); Phone call with rebuttal expert (0.6); Draft update to client and provide report (0.3).	3.40	2,380.00
08/03/20	Bethany L. Rabe	Review expert report (1.0) and modify expert disclosure (.7).	1.70	663.00
08/04/20	Tyler R. Andrews	Revise draft of reply in support of motion for protective order.	0.50	350.00
08/05/20	Tyler R. Andrews	Review motion to extend discovery filed by LVS (0.5); Revise and finalize reply in support of protective order (0.4).	0.90	630.00
08/06/20	Tyler R. Andrews	Develop strategy on [REDACTED] (0.4); Research [REDACTED] (0.2).	0.60	420.00
08/06/20	Bethany L. Rabe	Review motion to extend discovery (0.2) and communicate with client regarding [REDACTED] (0.1); begin opposition to motion to extend discovery (0.9).	1.20	468.00
08/10/20	Bethany L. Rabe	Draft opposition to motion to extend discovery.	2.10	819.00
08/11/20	Tyler R. Andrews	Confer with client regarding [REDACTED]	0.30	210.00
08/18/20	Tyler R. Andrews	Revise opposition to motion to extend discovery (0.8); Confer with client on [REDACTED] (0.5).	1.30	910.00
08/19/20	Tyler R. Andrews	Revise opposition to motion to extend discovery (1.2); Review discovery documents gathered by client for production (0.6); [REDACTED] for upcoming depositions (0.5); Begin review of [REDACTED] (0.6).	2.90	2,030.00
08/19/20	Cynthia L. Ney	Review notice of depositions.	0.20	59.00
08/19/20	Bethany L. Rabe	Finalize opposition to plaintiff's motion to extend discovery (1.0); download and begin reviewing documents from client (2.0); Review and revise discovery responses from client (.9); draft updated deposition notices (.5).	4.40	1,716.00
08/20/20	Cynthia L. Ney	Finalize notice of depositions.	0.30	88.50
08/20/20	Bethany L. Rabe	Review documents provided by client in preparation for production.	0.80	312.00
08/21/20	Tyler R. Andrews	Begin review of selected supplemental documents for production.	0.70	490.00
08/24/20	Bethany L. Rabe	Confer with client regarding [REDACTED]	0.80	312.00
08/25/20	Tyler R. Andrews	Conduct final review of all client documents	1.30	910.00

Invoice No.: 5475910
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 2

		for production (0.9); Confer with client regarding [REDACTED] (0.4).		
08/26/20	Tyler R. Andrews	Review new reply in support of discovery extension.	0.50	350.00
08/26/20	Cynthia L. Ney	Preparation of first supplemental disclosures (1.1); preparation of supplemental materials for production (1.5).	2.60	767.00
08/28/20	Tyler R. Andrews	Receive and review objections to pending depositions of LVS and representatives.	0.40	280.00
			<hr/>	
			<u>Total Time:</u>	27.60
			<u>Total Fees:</u>	\$ 14,654.50

Invoice No.: 5475910
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

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Description of Expenses Billed:

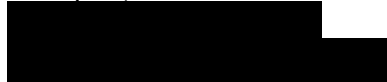
<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file



Invoice No.: 5497489
File No. : 156688.028600
Bill Date : October 1, 2020

Groupon, Inc.



Chicago, IL 211106

Attn:



INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through September 30, 2020:

Total Fees:	\$	7,962.50
Current Invoice:	\$	<u>7,962.50</u>

MKG:AC

Tax ID: 13-3613083

Invoice No.: 5497489
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
09/08/20	Tyler R. Andrews	Develop strategy on [REDACTED] (0.3); Prepare for meet and confer with opposing counsel (0.3).	0.60	420.00
09/09/20	Tyler R. Andrews	Confer with client on [REDACTED] (0.3); Outline strategy for pending depositions of LVS representatives (0.4).	0.70	490.00
09/09/20	Bethany L. Rabe	Review discovery requests to determine if [REDACTED].	0.90	351.00
09/10/20	Tyler R. Andrews	Review motion for protective order filed by LVS (0.5); Begin outline of opposition arguments and facts (0.5); Receive and review order from Magistrate granting Groupon protective order and extending discovery (0.4).	1.40	980.00
09/14/20	Tyler R. Andrews	Develop strategy on [REDACTED] (0.3); Develop strategy on [REDACTED] (0.3); Correspondence with opposing counsel (0.2).	0.80	560.00
09/16/20	Tyler R. Andrews	Confer with opposing counsel on expert depositions (0.3); Confer with opposing counsel on pending discovery schedule and withdrawal of protective order motion (0.3).	0.60	420.00
09/17/20	Tyler R. Andrews	Correspondence with opposing counsel regarding pending depositions (0.2); Approve notices vacating same (0.2); Strategy on LVS' motion for protective order (0.2).	0.60	420.00
09/17/20	Cynthia L. Ney	Prepare notice of vacating depositions	0.40	118.00
09/21/20	Tyler R. Andrews	Research all pending depositions and objections to notices (0.2); Prepare for meet and confer with LVS counsel regarding protective order and discovery responses (0.3); Analyze objections to virtual depositions in LVS motion (0.2).	0.70	490.00
09/22/20	Tyler R. Andrews	Work on opposition to protective order motion (0.5); Outline objections to proposed in-person depositions of Groupon employees and experts (0.3).	0.80	560.00
09/22/20	Bethany L. Rabe	Per T. Andrews, draft opposition to motion for protective order.	1.10	429.00
09/23/20	Tyler R. Andrews	Correspondence with opposing counsel on discovery issues (0.3); Revise stipulation (0.2); Develop strategy re [REDACTED] (0.2).	0.70	490.00
09/23/20	Cynthia L. Ney	Preparation of stipulation to respond to motion for protective order.	0.50	147.50
09/23/20	Bethany L. Rabe	Draft declaration of T. Andrews and finalize opposition for filing (.7); review and revise stipulation and order regarding extension for opposition (.3).	1.00	390.00

Invoice No.: 5497489
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 2

09/25/20	Tyler R. Andrews	Prepare for meet and confer with opposing counsel on all discovery issues.	0.40	280.00
09/30/20	Tyler R. Andrews	Multiple meet and confers with counsel regarding virtual depositions and protective order (0.5); Revise opposition to protective order (0.6); Review updated deposition notices for Groupon employees (0.2).	1.30	910.00
09/30/20	Bethany L. Rabe	Rework opposition to account for new events and exhibits.	1.30	507.00
			<u>Total Time:</u>	13.80
			<u>Total Fees:</u>	\$ 7,962.50

Invoice No.: 5497489
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file



Invoice No.: 5531360
File No.: 156688.028600
Bill Date: November 3, 2020

Groupon, Inc.
[REDACTED]
[REDACTED]
Chicago, IL 211106

Attn: [REDACTED]
[REDACTED]

INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through October 31, 2020:

Total Fees:	\$	11,168.50
Current Invoice:	\$	<u>11,168.50</u>

MKG:DK
Tax ID: 13-3613083

Invoice No.: 5531360
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/01/20	Tyler R. Andrews	Draft comprehensive status and strategy update (0.4); Prepare for call with client (0.3).	0.70	490.00
10/02/20	Tyler R. Andrews	Correspondence with opposing counsel regarding depositions and discovery (0.3).	0.30	210.00
10/05/20	Tyler R. Andrews	Call with client to discuss [REDACTED] (0.5); E-mail to opposing counsel to respond and reject all meet and confer points (0.6); Draft re-notice depositions of LVS representatives (0.3); Revise supplemental Interrogatory responses (0.4); Prepare for hearing on Protective Order motion (0.4).	2.20	1,540.00
10/06/20	Tyler R. Andrews	Review all documents and pleadings regarding pending protective order motion (0.3); Draft and send comprehensive meet and confer e-mail to opposing counsel on all pending topics (0.5).	0.80	560.00
10/07/20	Tyler R. Andrews	Conference call concerning [REDACTED].	0.50	350.00
10/07/20	Bethany L. Rabe	Confer with client regarding [REDACTED].	0.20	78.00
10/08/20	Tyler R. Andrews	Correspondence with opposing counsel on remote depo protocols and disputed depositions of Groupon employees.	0.30	210.00
10/09/20	Tyler R. Andrews	Update client on [REDACTED] (0.3); Prepare for hearing on motion for protective order (0.4); Review [REDACTED] and other documents for privilege (0.3); Strategize regarding [REDACTED] (0.2).	1.20	840.00
10/09/20	Bethany L. Rabe	Develop strategy on [REDACTED]	0.60	234.00
10/12/20	Tyler R. Andrews	Correspondence to opposing counsel regarding depositions and Protective Order motion (.3); Analyze [REDACTED] (0.4).	0.70	490.00
10/15/20	Tyler R. Andrews	Receive and review LVS reply in support of motion for protective order (0.5); Develop strategy for hearing on same (0.2).	0.70	490.00
10/16/20	Tyler R. Andrews	Review order from Judge Ferenbach denying protective order and requiring meet and confer (0.3); Develop strategy on [REDACTED] (0.3); Prepare for meet and confer video-conference with Gibson as ordered (0.3).	0.90	630.00
10/19/20	Tyler R. Andrews	Conduct meet and confer video-conference with opposing counsel (0.6); Review all documents and notices regarding pending depositions (0.5); Correspondence with client re [REDACTED] (0.2); Strategy on [REDACTED] (0.6).	1.90	1,330.00
10/20/20	Tyler R. Andrews	Review virtual deposition parameters from opposing counsel (0.2); Research and respond	0.90	630.00

Invoice No.: 5531360
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

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		to same (0.3); Prepare for meet and confer on Protective Order motion to prevent irrelevant Groupon employee depositions (0.4).		
10/20/20	Cynthia L. Ney	Research registered agent for Bitly (0.3); preparation of subpoena directed to Bitly (0.6).	0.90	265.50
10/21/20	Tyler R. Andrews	Review and finalize subpoena to Bitly and serve.	0.60	420.00
10/22/20	Tyler R. Andrews	Meet and confer regarding deposition protocols and proposed dates.	0.40	280.00
10/22/20	Cynthia L. Ney	Prepare notice of issuance of subpoena;	0.20	59.00
10/26/20	Tyler R. Andrews	Conduct meet and confer with opposing counsel on improper depositions (0.6); Status update to client on all issues (0.3).	0.90	630.00
10/26/20	Bethany L. Rabe	Per T. Andrews, draft stipulation regarding discovery moving forward.	0.80	312.00
10/27/20	Tyler R. Andrews	Correspondence with client re [REDACTED] (0.2); Revise stipulation with opposing counsel (0.2) Check with expert re deposition availability (0.2).	0.60	420.00
10/27/20	Mark E. Ferrario	Review correspondence from Plaintiff concerning discovery issues and deposition protocols (0.2); Develop strategy on response to same (0.2).	0.40	280.00
10/29/20	Tyler R. Andrews	Revise and file Stipulation on all pending discovery issues (0.4); Correspondence with opposing counsel on deposition dates (0.2).	0.60	420.00
			<hr/>	
			<u>Total Time:</u>	17.30
			<u>Total Fees:</u>	\$ 11,168.50

Invoice No.: 5531360
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file



Invoice No. : 5556225
File No. : 156688.028600
Bill Date : December 2, 2020

Groupon, Inc.
[REDACTED]
[REDACTED]
Chicago, IL 211106

Attn: [REDACTED]
[REDACTED]

INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through November 30, 2020:

Total Fees: \$ 16,224.00

Current Invoice: \$ 16,224.00

Previous Balance (see attached statement): \$ [REDACTED]

Total Amount Due: \$ [REDACTED]

MKG:DK
Tax ID: 13-3613083

Invoice No.: 5556225
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
11/03/20	Tyler R. Andrews	Review amended deposition notices of Groupon 30b6 witness and expert (0.1) and develop strategy for objections (0.2).	0.30	210.00
11/04/20	Tyler R. Andrews	Correspondence with counsel for Bitly regarding subpoena responses.	0.30	210.00
11/05/20	Tyler R. Andrews	Prepare for meet and confer with opposing counsel on all discovery disputes (0.6); Correspondence with Bitly counsel on scope of data requested (0.3); Draft objections to new deposition notices (0.4).	1.30	910.00
11/06/20	Tyler R. Andrews	Follow up correspondence with Bitly counsel regarding jurisdiction of service and scope of data requested.	0.30	210.00
11/10/20	Tyler R. Andrews	Conference call with client to discuss [REDACTED] [REDACTED] (0.5); Develop strategy for [REDACTED] [REDACTED] (0.4); Confer with opposing counsel on deposition dates (0.3).	1.20	840.00
11/11/20	Tyler R. Andrews	Conduct meet and confer call on all pending discovery responses (0.7); Begin outline of supplemental responses to interrogatories (0.4).	1.10	770.00
11/12/20	Tyler R. Andrews	Develop strategy regarding Groupon depositions of Plaintiff representatives (0.5); Update client with [REDACTED] [REDACTED] (0.2); Respond to Plaintiff improper notices of Eller, Wellebir, and Wilkerson (0.2). Continue outline of second protective order motion (0.3).	1.20	840.00
11/12/20	Cynthia L. Ney	Review court order regarding depositions (0.2); preparation of notice of depositions pursuant to court order (0.4)	0.60	177.00
11/12/20	Bethany L. Rabe	Revise deposition notice (.2); Prepare written discovery objection strategy and deposition objections (1.2).	1.40	546.00
11/13/20	Tyler R. Andrews	Review and revise objections to Plaintiff's 30b6 deposition notices (0.4); Review and revise supplemental responses to Plaintiff discovery requests (0.3).	0.70	490.00
11/13/20	Bethany L. Rabe	Work on objections to 30(b)(6) deposition and objections and responses to all discovery per Plaintiff's request.	2.40	936.00
11/17/20	Tyler R. Andrews	Conduct meet and confer with opposing counsel (0.9); Finalize and serve deposition notices (0.4); Outline motions for protective order (0.3).	1.60	1,120.00
11/17/20	Cynthia L. Ney	Finalize notice of depositions.	0.30	88.50
11/17/20	Bethany L. Rabe	Attend meet and confer conference (0.9); Research issue relating to [REDACTED] [REDACTED] (0.4).	1.30	507.00
11/18/20	Tyler R. Andrews	Receive and review data from Bitly responsive to subpoena (0.4); Begin analysis of [REDACTED] [REDACTED]	1.10	770.00

Invoice No.: 5556225
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 2

		in case (0.5); Prepare disclosures to opposing counsel (0.2).		
11/19/20	Tyler R. Andrews	Call with client to discuss [REDACTED] (0.3); Continue analysis of [REDACTED] (0.4).	0.70	490.00
11/19/20	Cynthia L. Ney	Preparation of Second Supplemental Disclosure and supplemental document production.	0.70	206.50
11/23/20	Tyler R. Andrews	Prepare for 30(b)(6) witness meeting (0.4); Develop strategy on [REDACTED] (0.3); Review and revise supplemental responses to discovery (0.6).	1.30	910.00
11/24/20	Tyler R. Andrews	Conduct witness preparation meeting with Jimmy Cotterman of Groupon (2.4); Pre-meeting strategy call with client counsel (0.4); Correspondence with J. Moulin regarding [REDACTED] (0.4).	3.20	2,240.00
11/24/20	Bethany L. Rabe	Begin preparation for upcoming depositions by beginning deposition outline.	1.50	585.00
11/25/20	Tyler R. Andrews	Confer with opposing counsel regarding depositions and discovery issues.	0.40	280.00
11/25/20	Bethany L. Rabe	Develop strategy for upcoming depositions.	1.60	624.00
11/30/20	Tyler R. Andrews	Conduct witness preparation meeting with Rich Missey (2.4); Consult with client on [REDACTED] (0.5).	2.90	2,030.00
11/30/20	Bethany L. Rabe	Communicate with K. McCormick regarding [REDACTED].	0.60	234.00
			<u>Total Time:</u>	28.00
			<u>Total Fees:</u>	\$ 16,224.00

Invoice No.: 5556225
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

Page 3

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file



Invoice No.: 5578464
File No.: 156688.028600
Bill Date: January 4, 2021

Groupon, Inc.
[REDACTED]
[REDACTED]
Chicago, IL 211106

Attn: [REDACTED]
[REDACTED]

INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through December 31, 2020:

Total Fees: \$ 39,876.00

Expenses:

Consulting Services

2,800.00

Total Expenses: \$ 2,800.00

Current Invoice: \$ 42,676.00

Previous Balance (see attached statement): \$ [REDACTED]

Total Amount Due: \$ [REDACTED]

MKG:DK
Tax ID: 13-3613083

Invoice No.: 5578464
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/01/20	Tyler R. Andrews	Correspondence with opposing counsel regarding upcoming depositions.	0.30	210.00
12/02/20	Tyler R. Andrews	Correspondence and strategy regarding [REDACTED] (0.4); Draft status update for client regarding [REDACTED] (0.3); Outline response to Gibson meet and confer demands (0.5); Research [REDACTED] (0.6).	1.80	1,260.00
12/02/20	Bethany L. Rabe	Per T. Andrews, [REDACTED] (2.5); develop strategy regarding depositions given opposing counsel's refusal to provide dates for their client (.2).	2.70	1,053.00
12/03/20	Tyler R. Andrews	Prepare for meet and confer on deposition and discovery issues with opposing counsel (0.6); Revise [REDACTED] (0.7); Multiple correspondence with client on [REDACTED] (0.5); Draft outline for pending depositions of LVS principals (0.4); Prepare for deposition defense of Groupon's 30(b)(6) witness (0.5).	2.70	1,890.00
12/03/20	Bethany L. Rabe	Prepare deposition outlines.	1.20	468.00
12/04/20	Tyler R. Andrews	Pre-deposition strategy call with client and witness (0.5); Conduct defense of Groupon corporate representative deposition (6.8); Review documents and expert reports in preparation for deposition (0.7); Outline second Protective Order motion to prohibit additional depositions noticed by LVS (0.9).	8.90	6,230.00
12/04/20	Bethany L. Rabe	Per T. Andrews, begin research in support of [REDACTED].	0.80	312.00
12/05/20	Tyler R. Andrews	Correspondence and strategy re expert deposition objections pending meet and confer with opposing counsel (0.4); Prepare for Kelvin Wilkerson deposition (0.5).	0.90	630.00
12/05/20	Bethany L. Rabe	Work on motion for protective order (2.3); prepare for meet and confer (.4); work on deposition outline (.5.)	3.20	1,248.00
12/07/20	Tyler R. Andrews	Meet and confer with opposing counsel on all pending discovery issues (1.2); Phone conference with client on status and strategy (0.4); Continue revisions to protective order draft (0.3); Draft proposed scheduling plan and order for remaining depositions (0.5); Receive and review rough draft transcript of Groupon corporate representative (0.8); Conduct research on [REDACTED] (0.7).	3.90	2,730.00
12/07/20	Bethany L. Rabe	Continue drafting deposition outline for Plaintiff's two principles and 30(b)(6) (2.3);	2.50	975.00

Invoice No.: 5578464
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

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12/08/20	Tyler R. Andrews	research [REDACTED] (.2). Review demand from opposing counsel on depositions and 30(b)(6) disputes (0.4); Develop strategy on response and draft outline for client (0.7); Discussions with client on [REDACTED] (0.8); Continue preparation for Wilkerson deposition (0.6).	2.50	1,750.00
12/08/20	Bethany L. Rabe	Prepare amended notices of depositions.	2.30	897.00
12/09/20	Tyler R. Andrews	Correspondence with client regarding [REDACTED] (0.4); Confer with opposing counsel on vacated depositions of Plaintiffs and responses (0.7); Revise amended expert notices and serve (0.2).	1.30	910.00
12/09/20	Bethany L. Rabe	Research [REDACTED] (0.7); prepare questions and potential exhibits for K. Wilkerson deposition (0.5); update deposition notice for expert (0.1).	1.30	507.00
12/10/20	Tyler R. Andrews	Prepare for Wilkerson deposition and draft final outline (0.9); Conduct Wilkerson deposition (0.5); Update client [REDACTED] (0.4); [REDACTED] and update client (0.4); Correspondence with expert (0.3); Analyze [REDACTED] (0.3).	2.80	1,960.00
12/11/20	Tyler R. Andrews	Correspondence with client on [REDACTED]	0.20	140.00
12/14/20	Tyler R. Andrews	Research [REDACTED] (0.8); Negotiate revised deposition dates for expert and witnesses (0.4); Review materials for Groupon corporate witness deposition prep session (0.8); Revise proposed stipulation on discovery dates (0.4).	2.40	1,680.00
12/14/20	Bethany L. Rabe	Draft stipulation regarding extension of dispositive motion deadline.	0.70	273.00
12/15/20	Tyler R. Andrews	Conduct meet and confer video conference with opposing counsel (1.2);	1.20	840.00
12/15/20	Bethany L. Rabe	Review stipulation proposed changes and research regarding deposition time of day.	0.20	78.00
12/16/20	Tyler R. Andrews	Draft [REDACTED] (0.6); Conduct Groupon corporate witness prep meeting (2.3); Finalize and serve objections to latest deposition notice from LVS (0.4); Correspondence with opposing counsel on scheduling (0.3).	3.60	2,520.00
12/16/20	Bethany L. Rabe	Per T. Andrews, update objections to 30(b)(6) deposition notice and submit to T. Andrews for review.	0.60	234.00
12/17/20	Tyler R. Andrews	Correspondence with witness and provide review documents for deposition (0.6); Correspondence with client on [REDACTED] (0.4); Review expert report and confirm scope of supplement (0.4).	1.40	980.00
12/18/20	Tyler R. Andrews	Correspondence with client on [REDACTED]	1.80	1,260.00

Invoice No.: 5578464
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

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		██████████ (0.4); Confer with expert witness on ██████████ (0.4); Review ██████████ ██████████ (0.5); Begin draft of Plaintiff deposition outlines (0.5).		
12/18/20	Bethany L. Rabe	Develop strategy regarding ██████████ ██████████	0.40	156.00
12/21/20	Tyler R. Andrews	Final preparations for defense of Groupon 30b6 deposition (0.5); Confer with Groupon representative Tricia Higgins re same (0.3).	0.80	560.00
12/22/20	Tyler R. Andrews	Final preparations for deposition of Groupon 30b6 (0.4); Conduct pre-deposition strategy call with client counsel and witness (0.6); Conduct defense of Plaintiff's deposition of Groupon corporate witness on social media marketing (5.3); Follow up correspondence with client and witness (0.3); Research ██████████ ██████████ (0.3).	6.90	4,830.00
12/22/20	Bethany L. Rabe	Finish deposition outline; perform research into ██████████ per T. Andrews.	1.90	741.00
12/28/20	Tyler R. Andrews	Review ██████████ ██████████ (0.4); Conduct meet and confer with Steve Gibson regarding alleged incompetence of Groupon representative witnesses (0.9).	1.30	910.00
12/28/20	Bethany L. Rabe	Develop strategy for discovery and per T. Andrews (0.7), create custodian of records declaration (0.7).	1.40	546.00
12/29/20	Tyler R. Andrews	Strategy on ██████████ (0.4); Confer with opposing counsel on verifications and provide same (0.2); Follow up with Bitly counsel on COR affidavit (0.3).	0.90	630.00
12/29/20	Bethany L. Rabe	Update motion for protective order regarding Eller and Welebir (0.8); draft supplemental disclosure per T. Andrews (0.4).	1.20	468.00
			<hr/>	
			<u>Total Time:</u>	66.00
			<u>Total Fees:</u>	\$ 39,876.00

Invoice No.: 5578464
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
12/21/20	VENDOR: wamason.com LLC INVOICE#: 72122120280 DATE: 12/21/2020 Prepayment for testifying at January 13, 2021 deposition.	\$ 2,800.00
Total Expenses:		\$ 2,800.00



Invoice No.: 5604643
File No.: 156688.028600
Bill Date: February 2, 2021

Groupon, Inc.
[REDACTED]
[REDACTED]
Chicago, IL 211106

Attn: [REDACTED]
[REDACTED]

INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through January 31, 2021:

Total Fees: \$ 40,857.00

Expenses:

Service Company Charges 2,210.00
Transcript Charges 3,051.20

Total Expenses: \$ 5,261.20

Current Invoice: \$ 46,118.20

MKG:DK

Tax ID: 13-3613083

Invoice No.: 5604643
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
01/04/21	Tyler R. Andrews	Prepare for deposition of LVS expert Anthony Mason (0.5); Research [REDACTED] (0.3); Advise on templates for LVS witness depositions (0.4); Begin analysis of LVS' 2 motions to compel (0.3).	1.50	1,050.00
01/04/21	Bethany L. Rabe	Perform research into [REDACTED] per T. Andrews (.3); review motions to compel filed by plaintiff (1.1).	1.40	546.00
01/05/21	Tyler R. Andrews	Strategy discussion with client on [REDACTED] (0.6); Research [REDACTED] and begin outline of oppositions (0.8); Prepare for Mason deposition (0.5).	1.90	1,330.00
01/05/21	Bethany L. Rabe	Per T. Andrews, work on drafts of oppositions to motions to compel.	4.00	1,560.00
01/06/21	Tyler R. Andrews	Review [REDACTED]	0.70	490.00
01/06/21	Bethany L. Rabe	Work on opposition to motions to compel.	2.10	819.00
01/07/21	Tyler R. Andrews	Incorporate [REDACTED] into outline for deposition of Anthony Mason (0.5); Confer with client on [REDACTED] (0.5); Receive and conduct initial review transcript of Higgins (0.4).	1.40	980.00
01/07/21	Bethany L. Rabe	Continue drafting opposition to motions to compel and submit for review.	2.50	975.00
01/08/21	Tyler R. Andrews	Draft and revise opposition to motions to compel (0.9); Draft final outline for expert depositions (0.8).	1.70	1,190.00
01/10/21	Tyler R. Andrews	Correspondence with opposing counsel regarding expert deposition and fee issue (0.4); Receive and review client's edits to draft opposition to motion to compel (0.3).	0.70	490.00
01/11/21	Tyler R. Andrews	Revise opposition to motions to compel and incorporate all client edits (2.3); Finalize preparations for Mason deposition (3.9).	6.20	4,340.00
01/11/21	Bethany L. Rabe	Review transcripts for supporting citations to motion to compel (1.2); Research [REDACTED] (1.4).	2.60	1,014.00
01/12/21	Tyler R. Andrews	Final preparations for deposition of Anthony Mason (0.7); Research [REDACTED] (0.7); Draft final declaration in support of opposition to motion to compel (0.4); Begin draft of outlines for LVS 30(b)(6) witnesses (0.6).	2.40	1,680.00
01/12/21	Bethany L. Rabe	Develop strategy for opposition brief.	0.30	117.00
01/13/21	Tyler R. Andrews	Complete final edits and revisions to deposition outline for Mason (1.4); Conduct deposition of Anthony Mason (5.4); Prepare for LVS 30(b)(6) deposition (2.8); Finalize opposition to motion to compel (2.2)	11.80	8,260.00
01/13/21	Bethany L. Rabe	Revise opposition to motions to compel (1.3); update 30(b)(6) outline for deposition (1.6).	2.90	1,131.00

Invoice No.: 5604643
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

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01/14/21	Tyler R. Andrews	Final preparation for deposition of LVS 30(b)(6) representative and incorporate edits of client to outline (0.9); Conduct deposition of LVS corporate witness (6.9); Update client with status (0.5); Prepare for individual deposition of Iva Vassilev (1.6).	9.90	6,930.00
01/14/21	Bethany L. Rabe	Assist with deposition strategy.	0.30	117.00
01/15/21	Tyler R. Andrews	Final preparations and outline for deposition of Iva Vassilev (0.8); Conduct deposition of Iva Vassilev (3.9).	4.70	3,290.00
01/15/21	Bethany L. Rabe	Create updated outline for deposition of I. Vassilev.	1.80	702.00
01/20/21	Tyler R. Andrews	Receive and review reply in support of motion to compel filed by LVS.	0.20	140.00
01/21/21	Tyler R. Andrews	Conduct research on [REDACTED]	0.40	280.00
01/22/21	Tyler R. Andrews	Confer with client on [REDACTED] (0.3); Begin review of deposition transcripts for best testimony clips to support summary judgment motion (0.5).	0.80	560.00
01/27/21	Tyler R. Andrews	Continue review of expert Mason transcript for favorable witness testimony for summary judgment motion.	0.50	350.00
01/27/21	Bethany L. Rabe	Review [REDACTED] per client request.	1.60	624.00
01/28/21	Tyler R. Andrews	Draft status and strategy update for client (0.3); Receive amended deposition notice for Eller and develop strategy re same (0.3); Research [REDACTED] (0.3).	0.90	630.00
01/28/21	Bethany L. Rabe	Prepare reference document with excerpts LVSA witnesses' deposition testimony for use in summary judgment motion.	1.70	663.00
01/29/21	Tyler R. Andrews	Receive and review order from Court denying LVS' motion to compel and requiring discovery protocols and joint filings (0.4); Develop strategy on response to same (0.2); Correspondence with Josh Moulin on pending deposition (0.2).	0.80	560.00
01/29/21	Bethany L. Rabe	Review court's order and develop strategy regarding same.	0.10	39.00
			<hr/>	
			<u>Total Time:</u>	67.80
			<u>Total Fees:</u>	\$ 40,857.00

Invoice No.: 5604643
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

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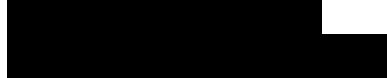
Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
12/31/20	VENDOR: Veritext LLC (2569) INVOICE#: 4706217 DATE: 12/31/2020 Job No 4346448; Skydiving Adventurers v. Groupon Inc; Witness (CXLD) Sammy Vassilev; Cancellation of Reporting Services, Exhibit Share and Veritext Virtual	\$ 745.00
01/04/21	VENDOR: Veritext LLC (2569) INVOICE#: 4747841 DATE: 1/4/2021 Job No 4346448; Las Vegas Skydiving Adventurers v. Groupon, Inc; Witness - (CLXD) Sammy Vassilev; Video - Cancellation	\$ 325.00
01/06/21	VENDOR: Veritext LLC (2569) INVOICE#: 4753748 DATE: 1/6/2021 Job No 4346480; Las Vegas Skydiving Adventures v. Groupon Inc; Witness (CXLD) W. Anthony Mason, Video - Cancellation	\$ 395.00
01/06/21	VENDOR: Veritext LLC (2569) INVOICE#: 4755574 DATE: 1/6/2021 Job No 4346480; Las Vegas Skydiving Adventures v. Groupon, Inc; Witness - (CXLD) W. Anthony Mason; Cancellation of Reporting Services, Exhibit Share and Veritext Virtual	\$ 745.00
01/11/21	VENDOR: Veritext LLC (2569) INVOICE#: 4762214 DATE: 1/11/2021 job 4383013, re: Case: Las Vegas Skydiving Adventures, LLC v. Groupon, Lie (2:18-cv-02342 APG-VCF)	\$ 748.05
01/22/21	VENDOR: Veritext LLC (2569) INVOICE#: 4782751 DATE: 1/22/2021 Job No. 4371265 01/15/21 Transcript of Ivelina Nencheva Vassilev	\$ 2,303.15
Total Expenses:		\$ 5,261.20



Invoice No.: 5622726
File No. : 156688.028600
Bill Date : March 2, 2021

Groupon, Inc.



Chicago, IL 211106

Attn:



INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through February 28, 2021:

Total Fees: \$ 34,366.00

Expenses:

Deposition/Court Reporters 1,937.50
Transcript Charges 6,948.80

Total Expenses: \$ 8,886.30

Current Invoice: \$ 43,252.30

MKG:AC

Tax ID: 13-3613083

Invoice No.: 5622726
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

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Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
02/01/21	Tyler R. Andrews	Prepare deposition excerpts for benefit of MSJ arguments (1.3); Correspondence with expert witness re [REDACTED] (0.8); Prepare for meet and confer with opposing counsel (0.3); Review orders denying LVS' motions to compel and update client regarding same (0.4).	2.80	1,960.00
02/02/21	Tyler R. Andrews	Correspondence with expert witness re deposition testimony (0.6); Prepare for protective order motion re Eller (0.4); Correspondence with opposing counsel re meet and confer (0.2).	1.20	840.00
02/02/21	Bethany L. Rabe	Outline strategy regarding meet and confer and motion for protective order in light of court's recent order.	0.40	156.00
02/03/21	Tyler R. Andrews	Conduct meet and confer with opposing counsel on all discovery issues (0.8); Summarize and confirm issues regarding Joint Report ordered by Court (0.3); Analyze [REDACTED] for use in summary judgment motion (0.4).	1.50	1,050.00
02/03/21	Bethany L. Rabe	Prepare declaration of S. Eller.	2.50	975.00
02/04/21	Tyler R. Andrews	Review expert analysis of [REDACTED] (0.7); Continue outline of motion for protective order for Eller deposition (0.3); Prep session with expert witness for pending deposition (0.8).	1.80	1,260.00
02/04/21	Bethany L. Rabe	Update motion for protective order to reflect Eller only.	1.20	468.00
02/05/21	Tyler R. Andrews	Correspondence with opposing counsel regarding expert deposition (0.3); Follow up conference with expert witness Josh Moulin regarding deposition prep and review (0.8); Receive and initial review of motion to strike expert witness by LVS counsel and develop strategy re same (1.0).	2.10	1,470.00
02/05/21	Bethany L. Rabe	Per T. Andrews, draft joint status report per Court's order (1.9); develop strategy for expert deposition with respect to motion for summary judgment (1.0).	2.90	1,131.00
02/08/21	Tyler R. Andrews	Final preparations for defense of deposition of Josh Moulin (0.6); Conduct defense of deposition of Josh Moulin (8.7); Update client on [REDACTED] (0.2).	9.50	6,650.00
02/08/21	Bethany L. Rabe	Per T. Andrews, begin drafting opposition to motion to strike.	1.90	741.00
02/09/21	Tyler R. Andrews	Finish initial draft of Joint Statement required by Court (0.7); E-mail client with status and strategy update (0.4); Outline Opposition to Motion to Strike expert witness Moulin (0.4).	1.50	1,050.00

Invoice No.:	5622726			Page 2
Re:	Las Vegas Skydiving Adventures			
Matter No.:	156688.028600			
02/09/21	Mark E. Ferrario	Review incoming document (0.2) and follow up with client (0.1).	0.30	210.00
02/09/21	Bethany L. Rabe	Research rules to determine whether [REDACTED] (.3); review draft joint statement in its entirety before T. Andrews sends to opposing counsel (.2).	0.50	195.00
02/10/21	Tyler R. Andrews	Call with Josh Moulin to discuss expert deposition (0.5); Correspondence with client [REDACTED] (0.4);	0.90	630.00
02/11/21	Tyler R. Andrews	Strategy with client regarding [REDACTED] (0.3); Draft correspondence to opposing counsel regarding deposition disputes (0.4); Revise Joint Report ordered by Court (0.2); Analyze demand of LVS counsel to proceed with deposition (0.7); Revise Eller motion for protective order based on same and send to client (0.8).	2.40	1,680.00
02/11/21	Mark E. Ferrario	Review incoming documents regarding response to opposing counsel.	0.20	140.00
02/11/21	Bethany L. Rabe	Work on declaration of T. Andrews in support of motion for protective order.	1.40	546.00
02/13/21	Bethany L. Rabe	Work on opposition to Plaintiff's motion to strike Moulin rebuttal report.	2.60	1,014.00
02/14/21	Bethany L. Rabe	Per T. Andrews, continue working on the opposition to motion to strike Groupon's expert witness.	3.90	1,521.00
02/16/21	Tyler R. Andrews	Revise opposition to motion to strike Groupon's expert witness (1.3); Outline motion for summary judgment arguments and timeline (0.5); Develop strategy on submission of Joint Statement (0.4); Confer with client and on pending discovery disputes (0.6).	2.80	1,960.00
02/16/21	Bethany L. Rabe	Update joint status report per T. Andrews.	2.10	819.00
02/17/21	Tyler R. Andrews	Continue revisions to draft Joint Report ordered by Court (0.8); Receive and review sealed motions to Plaintiff's motion to strike expert report (0.5); Finalize revisions to opposition to motion to strike expert report and submit to client (0.9).	2.20	1,540.00
02/18/21	Tyler R. Andrews	Develop strategy regarding [REDACTED].	0.20	140.00
02/19/21	Tyler R. Andrews	Final revisions to Joint Statement draft (0.9); Multiple calls to opposing counsel regarding improper new discovery disputes and additions to statement (0.8); Final revisions to opposition to Motion to Strike (0.9); Evaluate all remaining discovery issues (0.7); Correspondence with client on [REDACTED] (0.6); Review proposed exhibits cited by LVS in joint statement (0.4).	4.30	3,010.00
02/19/21	Bethany L. Rabe	Work on joint report edits (3.0); work on opposition to motion to strike expert witness report (2.0).	5.00	1,950.00
02/22/21	Tyler R. Andrews	Meet and confer with opposing counsel re discovery issues.	0.80	560.00

Invoice No.: 5622726
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

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02/24/21	Tyler R. Andrews	Receive and review motion to compel from LVS counsel based on allegedly insufficient 30b6 witnesses (0.3); Begin outline of opposition arguments for same (0.3).	0.60	420.00
02/25/21	Tyler R. Andrews	Research [REDACTED]	0.40	280.00
			<u>Total Time:</u>	59.90
			<u>Total Fees:</u>	\$ 34,366.00

Invoice No.: 5622726
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>		<u>AMOUNT</u>
01/21/21	VENDOR: Veritext LLC (2569) INVOICE#: 4782167 DATE: 1/21/2021 Job No. 4374690 01/13/21 Transcript of William Anthony Mason	\$	3,180.50
01/22/21	VENDOR: Veritext LLC (2569) INVOICE#: 4782767 DATE: 1/22/2021 Job No. 4371303 01/14/21 Transcript of Sammy Vassilev, LV Skydiving Adventures	\$	3,768.30
02/03/21	VENDOR: Litigation Services - ACH INVOICE#: 1436852 DATE: 2/3/2021 Kelvin Wilkerson deposition transcripts	\$	144.50
02/15/21	VENDOR: Veritext LLC (2569) INVOICE#: 4828792 DATE: 2/15/2021 Deposition of Anthony Mason	\$	1,793.00
		Total Expenses:	\$ 8,886.30



Invoice No.: 5645780
File No.: 156688.028600
Bill Date: April 2, 2021

Groupon, Inc.
[REDACTED]
[REDACTED]
Chicago, IL 211106

Attn: [REDACTED]
[REDACTED]

INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through March 31, 2021:

Total Fees: \$ 52,477.00

Expenses:

Deposition/Court Reporters 3,400.00
Transcript Charges 1,660.75

Total Expenses: \$ 5,060.75

Current Invoice: \$ 57,537.75

Previous Balance (see attached statement): \$ [REDACTED]

Total Amount Due: \$ [REDACTED]

MKG:DK

Tax ID: 13-3613083

Invoice No.: 5645780
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

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Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
03/01/21	Tyler R. Andrews	Review reply in support of motion to strike initial expert report (0.4); Review caselaw [REDACTED] (0.5).	0.90	630.00
03/02/21	Tyler R. Andrews	Update client regarding [REDACTED] (0.3); Review [REDACTED] (0.3).	0.60	420.00
03/02/21	Bethany L. Rabe	Work on opposition to plaintiff's motion to compel 30(b)(6) deponent.	7.30	2,847.00
03/03/21	Tyler R. Andrews	Review and revise opposition to motion to compel on 30b6 witnesses (1.2); Develop strategy on all pending discovery disputes (0.4).	1.60	1,120.00
03/03/21	Bethany L. Rabe	Work on opposition to motion to compel.	1.20	468.00
03/04/21	Tyler R. Andrews	Finalize revisions to opposition to motion to compel 30(b)(6) testimony regarding Higgins deposition.	0.60	420.00
03/05/21	Tyler R. Andrews	Develop strategy regarding pending deposition of Natalie Welebir (0.3); Correspondence with opposing counsel regarding improper notice of same (0.2); Develop strategy on upcoming summary judgment motion (0.4); Correspondence with opposing counsel on pending deposition notices (0.4).	1.30	910.00
03/05/21	Mark E. Ferrario	Review incoming documents regarding latest motions.	0.20	140.00
03/05/21	Bethany L. Rabe	Update opposition to motion for competent 30(b)(6) witness (0.4); draft email to opposing counsel regarding Welebir deposition (0.2).	0.60	234.00
03/07/21	Bethany L. Rabe	Work on motion for summary judgment.	3.00	1,170.00
03/08/21	Tyler R. Andrews	Finalize opposition to 30b6 motion regarding Missey deposition.	0.90	630.00
03/08/21	Bethany L. Rabe	Update opposition to motion to compel 30(b)(6) deposition.	0.70	273.00
03/09/21	Tyler R. Andrews	Correspondence with client on [REDACTED] (0.5); Research [REDACTED] (0.6); Receive and review new motion to compel filed regarding Higgins deposition (0.5).	1.60	1,120.00
03/09/21	Mark E. Ferrario	Review incoming documents (0.3); Follow up with client re: same (0.3).	0.60	420.00
03/10/21	Tyler R. Andrews	Respond to client concerning [REDACTED] (0.4); Draft legal argument in support of summary judgment (0.7); Continue revision to opposition to motion to compel 30(b)(6) testimony (0.4).	1.50	1,050.00
03/12/21	Bethany L. Rabe	Work on motion for summary judgment.	1.40	546.00
03/16/21	Tyler R. Andrews	Update research and drafting of misappropriation of commercial properties argument for summary judgment motion.	0.70	490.00
03/16/21	Bethany L. Rabe	Start drafting opposition to motion to compel	0.20	78.00

Invoice No.: 5645780
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

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Date	Person	Description	Hours	Amount
03/17/21	Tyler R. Andrews	competent 30(b)(6) witness (Higgins). Review and revise initial draft of motion for summary judgment.	1.70	1,190.00
03/18/21	Tyler R. Andrews	Review and revise initial draft of opposition to 30(b)(6) deposition issues on Higgins deposition.	0.70	490.00
03/18/21	Bethany L. Rabe	Work on opposition to motion to compel 30(b)(6) testimony (Higgins).	1.70	663.00
03/19/21	Bethany L. Rabe	Finish opposition to motion to compel (Higgins) (2.3); research [REDACTED] (1.3).	3.60	1,404.00
03/20/21	Bethany L. Rabe	Draft misappropriation section of motion for summary judgment.	2.20	858.00
03/21/21	Tyler R. Andrews	Final revisions to opposition on 30(b)(6) motion for submission to client for review.	0.70	490.00
03/22/21	Tyler R. Andrews	Complete draft of introduction, background fact, and legal argument sections of summary judgment motion on all claims against Groupon (4.7); Conduct additional research on [REDACTED] (2.2).	6.90	4,830.00
03/23/21	Tyler R. Andrews	Complete draft of motion for summary judgment and submit to client for review (5.4); Complete revisions to opposition to motion to compel regarding Higgins deposition (2.6); Conduct additional investigation of record for deposition citations to support summary judgment (0.8).	8.80	6,160.00
03/23/21	Mark E. Ferrario	Review incoming documents regarding motion for summary judgment.	0.90	630.00
03/23/21	Bethany L. Rabe	Finalize opposition to 30(b)(6) (Higgins) (1.3); work on motion for summary judgment in light of client revisions (4.4).	5.70	2,223.00
03/24/21	Tyler R. Andrews	Draft introduction and facts section for MSJ (0.9); Revise legal argument sections and include consumer confusion caselaw from Ninth Circuit (0.8); Review deposition transcripts for additional testimony in support of summary judgment (1.2); Revise argument section on damages and send initial draft to client (0.7).	3.60	2,520.00
03/24/21	Bethany L. Rabe	Revised motion for summary judgment.	0.30	117.00
03/25/21	Tyler R. Andrews	Revise draft of summary judgment motion per client edits and redlines (1.3); Correspondence with Bitly counsel regarding custodian of records affidavit (0.3).	1.60	1,120.00
03/25/21	Bethany L. Rabe	Work on additional research in support of motion for summary judgment.	1.10	429.00
03/26/21	Tyler R. Andrews	Revise legal argument and supporting exhibits for pending summary judgment motion (0.7); Receive and review final edits and revisions from client and incorporate same (0.5).	1.20	840.00
03/26/21	Bethany L. Rabe	Work on revisions to motion for summary judgment and strategy regarding same.	5.10	1,989.00
03/28/21	Tyler R. Andrews	Continue draft and revisions to final version of motion for summary judgment.	2.30	1,610.00
03/29/21	Tyler R. Andrews	Incorporate additional research on metadata	6.80	4,760.00

Invoice No.: 5645780
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 3

		infringement to draft summary judgment motion (1.3); Continue revisions and updates to draft summary judgment motion (3.2); Correspondence with Bitly counsel and secure copy of affidavit (0.3); Complete revisions to final draft of motion and submit same to client (2.0).		
03/29/21	Bethany L. Rabe	Make additional changes to Groupon MSJ and work on T. Andrews declaration in support.	2.10	819.00
03/30/21	Tyler R. Andrews	Complete final draft of summary judgment motion for filing (3.7); Revise all exhibits, citations, and argument sections (0.6); Review and revise draft declaration in support of motion (0.9); Correspondence with expert witness regarding [REDACTED] (0.6).	5.80	4,060.00
03/30/21	Bethany L. Rabe	Make final changes to motion for summary judgment, including strategy regarding same and reviewing exhibits and citations to exhibits to ensure accuracy.	5.60	2,184.00
			<hr/>	
			<u>Total Time:</u>	93.30
			<u>Total Fees:</u>	\$ 52,352.00

Invoice No.: 5645780
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>		<u>AMOUNT</u>
02/19/21	VENDOR: Veritext LLC (2569) - ACH INVOICE#: 4841098 DATE: 2/19/2021 Job No. 4371303 01/14/21 Deposition Video of Sammy Vassilev	\$	2,213.00
02/19/21	VENDOR: Veritext LLC (2569) - ACH INVOICE#: 4840827 DATE: 2/19/2021 Job No. 4371265 01/15/21 Deposition Video of Ivelina Nencheva Vassilev	\$	1,187.00
02/23/21	VENDOR: Veritext LLC (2569) - ACH INVOICE#: 4846692 DATE: 2/23/2021 Job No. 4325864 02/08/21 Transcript of Joshua S. Moulin	\$	1,660.75
		Total Expenses:	\$ 5,060.75



Invoice No. : 5682491
File No. : 156688.028600
Bill Date : May 4, 2021

Groupon, Inc.

[REDACTED]

[REDACTED]

Chicago, IL 211106

Attn:

[REDACTED]

[REDACTED]ty

INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through April 30, 2021:

Total Fees: \$ 8,290.00

Current Invoice: \$ 8,290.00

MKG:DK

Tax ID: 13-3613083

Invoice No.: 5682491
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
04/13/21	Tyler R. Andrews	Correspondence with opposing counsel and review stipulation regarding MSJ briefing (0.3); Continue research and outline in advance of MSJ opposition from LVS (0.4).	0.70	490.00
04/14/21	Tyler R. Andrews	Review prior rulings from Judge Gordon on sanctions issues (0.2); Correspondence with client [REDACTED] (0.1).	0.30	210.00
04/22/21	Tyler R. Andrews	Receive and review second motion for sanctions filed by LVS against Groupon (0.4); Develop strategy re opposition to same (0.4).	0.80	560.00
04/23/21	Tyler R. Andrews	Update client with [REDACTED]	0.30	210.00
04/23/21	Mark E. Ferrario	Review motion for sanctions.	0.60	420.00
04/23/21	Bethany L. Rabe	Prepaer initial outline for response to sanctions motion.	0.40	156.00
04/24/21	Bethany L. Rabe	Work on opposition to renewed motion for sanctions.	3.90	1,521.00
04/25/21	Bethany L. Rabe	Continue working on opposition to motion for sanctions.	3.30	1,287.00
04/26/21	Tyler R. Andrews	Develop strategy regarding response to Sanctions motion and reply in support of MSJ.	0.40	280.00
04/26/21	Bethany L. Rabe	Continue working on sanctions opposition, including review of Moulin transcript.	3.70	1,443.00
04/27/21	Bethany L. Rabe	Continue working on first draft of opposition to spoliation motion.	1.50	585.00
04/28/21	Tyler R. Andrews	Receive and review Plaintiff's opposition to Groupon's MSJ (0.3); Outline potential arguments for reply (0.3); Update client re [REDACTED] (0.2).	0.80	560.00
04/28/21	Bethany L. Rabe	Finalize first draft of opposition to sanctions motion.	0.20	78.00
04/29/21	Tyler R. Andrews	Revise initial draft of opposition to LVS' motion for sanctions.	0.70	490.00
<u>Total Time:</u>			17.60	
<u>Total Fees:</u>				\$ 8,290.00

Invoice No.: 5682491
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

Page 2

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file



Invoice No. : 5703937
File No. : 156688.028600
Bill Date : June 2, 2021

Groupon, Inc.
[REDACTED]
[REDACTED]
Chicago, IL 211106

Attn: [REDACTED]
[REDACTED]

INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through May 31, 2021:

Total Fees: \$ 27,096.00

Current Invoice: \$ **27,096.00**

Previous Balance (see attached statement):

\$ [REDACTED]

Total Amount Due:

\$ [REDACTED]

MKG:DK

Tax ID: 13-3613083

Greenberg Traurig, LLP | Attorneys at Law | 77 West Wacker Drive | Suite 3100 | Chicago, Illinois 60601 | Tel 312.456.8400 | Fax 312.456.8435 | www.gtlaw.com

Invoice No.: 5703937
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
05/01/21	Tyler R. Andrews	Final revisions to draft opposition to LVS' motion for sanctions (1.6); Submit same to client and provide status update (0.2).	1.80	1,260.00
05/03/21	Tyler R. Andrews	Develop strategy for opposition to LVS motion for sanctions.	0.30	210.00
05/05/21	Tyler R. Andrews	Continue review and revisions to opposition for motion for sanctions filed by LVS (1.3); Receive updated revisions and comments from client and incorporate same (0.6).	1.90	1,330.00
05/05/21	Bethany L. Rabe	Per client, make revisions to opposition to sanctions motion and send to T. Andrews for review (3.3); review and revise exhibits (.5)	3.80	1,482.00
05/06/21	Tyler R. Andrews	Final pre-filing edits and drafting to objection to LVS' motion for sanctions against Groupon (1.2); Receive final comments and revisions from client and incorporate prior to filing (0.4).	1.60	1,120.00
05/06/21	Bethany L. Rabe	Make edits to opposition to motion for sanctions per client.	2.60	1,014.00
05/11/21	Tyler R. Andrews	Draft legal argument section of reply in support of Groupon's motion for summary judgment.	2.70	1,890.00
05/12/21	Tyler R. Andrews	Complete initial draft of reply in support of MSJ.	9.70	6,790.00
05/12/21	Bethany L. Rabe	Per T. Andrews, draft section on Sleekcraft factors for reply brief.	1.90	741.00
05/13/21	Tyler R. Andrews	Receive edits from client and incorporate into draft final version of MSJ reply for filing (1.8); Analyze and outline additional arguments for inclusion (0.9).	2.70	1,890.00
05/13/21	Mark E. Ferrario	Review and revise reply in support of MSJ.	0.40	280.00
05/13/21	Bethany L. Rabe	Review [REDACTED]	0.40	156.00
05/17/21	Tyler R. Andrews	[REDACTED] Receive additional edits from client on final version of Reply in support of summary judgment motion and incorporate into final draft.	2.70	1,890.00
05/17/21	Bethany L. Rabe	Revise reply brief per T. Andrews; perform additional research in support of same.	6.50	2,535.00
05/18/21	Tyler R. Andrews	Draft final edits and revisions to final version of reply in support of MSJ (1.8); Coordinate final deposition testimony and other supplements for inclusion in filing (0.6).	2.40	1,680.00
05/18/21	Mark E. Ferrario	Review and revise reply in support of MSJ.	0.80	560.00
05/18/21	Bethany L. Rabe	Make additional changes to reply brief per T. Andrews and client.	4.20	1,638.00
05/26/21	Tyler R. Andrews	Receive and review order on hearing for all pending discovery disputes and motions filed by LVS (0.3); Prepare for oral argument and begin draft outline for hearing on all motions (0.6).	0.90	630.00
<u>Total Time:</u>			47.30	
<u>Total Fees:</u>				\$ 27,096.00

Invoice No.: 5703937
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

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Invoice No.: 5703937
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file



Invoice No. : 5719620
File No. : 156688.028600
Bill Date : July 2, 2021

Groupon, Inc.
[REDACTED]
[REDACTED]
Chicago, IL 211106

Attn: [REDACTED]
[REDACTED]

INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through June 30, 2021:

Total Fees: \$ 20,379.00

Expenses:

Deposition/Court Reporters 300.70
Parking Charges 4.00

Total Expenses: \$ 304.70

Current Invoice: \$ 20,683.70

Previous Balance (see attached statement): \$ [REDACTED]

Total Amount Due: \$ [REDACTED]

MKG:DK

Tax ID: 13-3613083

Greenberg Traurig, LLP | Attorneys at Law | 77 West Wacker Drive | Suite 3100 | Chicago, Illinois 60601 | Tel 312.456.8400 | Fax 312.456.8435 | www.gtlaw.com

Invoice No.: 5719620
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
06/02/21	Tyler R. Andrews	Prepare argument outline for pending hearing on all discovery issues.	0.60	420.00
06/07/21	Tyler R. Andrews	Develop strategy for pending hearing before Magistrate on all discovery issues (0.7). Receive and review further order from court re addition of filed joint statement to hearing agenda (0.3). Continue draft of issue and argument outline (0.5).	1.50	1,050.00
06/08/21	Tyler R. Andrews	Receive and review order granting withdrawal of Miletovic (0.2); Continue preparations for omnibus discovery hearing before Magistrate (0.4).	0.60	420.00
06/08/21	Bethany L. Rabe	Work on hearing outline per T. Andrews.	0.80	312.00
06/09/21	Tyler R. Andrews	Correspondence with client regarding [REDACTED] (0.3); Continue draft of argument outline (0.4); Review all relevant pleadings and orders (0.6).	1.30	910.00
06/09/21	Bethany L. Rabe	Work on hearing outline per T. Andrews.	2.50	975.00
06/10/21	Tyler R. Andrews	Revise final argument outline drafts on all matters for consideration at discovery hearing (1.3); Prepare for conference call with client on [REDACTED] (0.5).	1.80	1,260.00
06/10/21	Mark E. Ferrario	Review motions and develop strategy for oral argument during consolidated hearing.	0.80	560.00
06/10/21	Bethany L. Rabe	Per T. Andrews, continue to work on outlines for hearing.	5.40	2,106.00
06/11/21	Tyler R. Andrews	Conduct conference call with client regarding [REDACTED] (0.9); Continue updates to argument outlines (0.9); Review and revise "one sheet" notes on all discovery statistics and motions filed to date (0.4).	2.20	1,540.00
06/11/21	Mark E. Ferrario	Review documents in advance of hearing (0.2); attend client call (0.9).	1.10	770.00
06/11/21	Bethany L. Rabe	Participate in teleconference regarding hearing (.9); create "one sheet" per client request with discovery statistics (1.4).	2.30	897.00
06/13/21	Tyler R. Andrews	Review all pleadings and outlines in preparation for oral argument before Judge Ferenbach.	2.60	1,820.00
06/14/21	Tyler R. Andrews	Final preparations prior to hearing on all motions in federal court (1.4); Conduct hearing before Court and present argument (1.2); Draft status report [REDACTED] to client (0.4); Develop strategy for final MSJ arguments and fee recovery (0.5); Begin outline of affidavits for Eller and Welebir (0.3).	3.80	2,660.00
06/14/21	Mark E. Ferrario	Prepare for on multiple discovery motions filed by Plaintiff (0.5); Attend hearing and present argument to Court (1.2).	1.70	1,190.00
06/14/21	Bethany L. Rabe	Prepare for hearing and assist in developing oral argument outlines (0.7); Attend hearing on multiple discovery motions filed by Plaintiff.	1.90	741.00

Invoice No.: 5719620
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 2

06/15/21	Bethany L. Rabe	Per T. Andrews, draft affidavits for Eller and Welebir.	2.20	858.00
06/16/21	Tyler R. Andrews	Revise Eller and Welebir declarations.	0.20	140.00
06/18/21	Tyler R. Andrews	Conduct call with client regarding [REDACTED] (0.6); Develop strategy regarding next steps (0.3).	0.90	630.00
06/21/21	Tyler R. Andrews	Develop strategy for pending MSJ hearing and fee recovery motions.	0.50	350.00
06/28/21	Tyler R. Andrews	Review and revise declarations of Eller and Welebir per Court order (0.3); Continue outline and preparations for final MSJ issues and fees motion (0.4). Receive and review hearing transcript (0.4).	1.10	770.00
			<u>Total Time:</u>	35.80
			<u>Total Fees:</u>	\$ 20,379.00

Invoice No.: 5719620
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
06/14/21	VENDOR: Andrews, Tyler R. INVOICE#: 4628734307011343 DATE: 7/1/2021 Parking; 06/14/21 - In-Person Discovery Hearing	\$ 4.00
06/15/21	VENDOR: Christian, Paige M. INVOICE#: 20210008 DATE: 6/15/2021 Hearing transcript - motions heard 6.14.21	\$ 300.70
Total Expenses:		\$ 304.70



Invoice No.: 5745560
File No. : 156688.028600
Bill Date : August 3, 2021

Groupon, Inc.

Chicago, IL 211106

Attn:

INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through July 31, 2021:

Total Fees: \$ 13,767.00

Expenses:

Messenger/Courier Services

21.00

Total Expenses: \$ 21.00

Current Invoice: \$ 13,788.00

MKG:AC

Tax ID: 13-3613083

Invoice No.: 5745560
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/15/21	Bethany L. Rabe	Initial review newly filed motions.	0.40	156.00
07/17/21	Bethany L. Rabe	Begin reviewing in depth the motions filed by the plaintiffs' counsel.	1.60	624.00
07/18/21	Bethany L. Rabe	Work on opposition to motion for leave to file late objection to magistrate's order, including research into the issues and initial drafting of certain sections.	5.80	2,262.00
07/19/21	Bethany L. Rabe	Work on opposition to motion for reconsideration, including research in support of the same and drafting sections of the brief.	6.70	2,613.00
07/20/21	Bethany L. Rabe	Work on finalizing first draft of opposition to motion for reconsideration.	5.00	1,950.00
07/20/21	Bethany L. Rabe	Continue drafting opposition to motion for leave to late-file objections.	1.90	741.00
07/21/21	Bethany L. Rabe	Work on opposition to motion for leave to file objection late.	3.00	1,170.00
07/23/21	Bethany L. Rabe	Work on oppositions to motion for reconsideration and motion for leave to late file an objection to the same.	6.30	2,457.00
07/24/21	Bethany L. Rabe	Make final revisions to draft oppositions before sending to client.	1.60	624.00
07/27/21	Bethany L. Rabe	Per client, revise oppositions.	1.10	429.00
07/28/21	Bethany L. Rabe	Finalize oppositions.	1.90	741.00
<u>Total Time:</u>			35.30	
<u>Total Fees:</u>				\$ 13,767.00

Invoice No.: 5745560
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

Page 2

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
06/16/21	VENDOR: Nationwide Legal, LLC - 4527 INVOICE#: 00000031126 DATE: 6/30/2021 STANDARD DELIVERY from GT to USDC, 333 South Las Vegas Boulevard Las Vegas on 6/16/21 Req'd by/for Rosehill, Andrea	\$ 21.00
Total Expenses:		\$ 21.00



Invoice No. : 5800229
File No. : 156688.028600
Bill Date : September 2, 2021

Groupon, Inc.
[REDACTED]
[REDACTED]
Chicago, IL 211106

Attn: [REDACTED]
[REDACTED]

INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through August 31, 2021:

Total Fees: \$ 2,380.00

Expenses:

Information and Research

239.00

Total Expenses: \$ 239.00

Current Invoice: \$ 2,619.00

Previous Balance (see attached statement): \$ [REDACTED]

Total Amount Due: \$ [REDACTED]

MKG:AR

Tax ID: 13-3613083

Invoice No.: 5800229
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
07/15/21	Tyler R. Andrews	Receive and revire two new reconsideration motions from Plaintiff on discovery issues (0.5); Develop strategy re same (0.5).	1.00	700.00
07/17/21	Tyler R. Andrews	Confer with client on [REDACTED] [REDACTED]	0.40	280.00
07/21/21	Tyler R. Andrews	Review and revise draft oppositions to new reconsideration motions filed by Plaintiff.	0.60	420.00
07/23/21	Tyler R. Andrews	Receive new materials and authorities [REDACTED] [REDACTED]	0.50	350.00
07/27/21	Tyler R. Andrews	Revise and finalize draft oppositions for filing.	0.40	280.00
08/05/21	Tyler R. Andrews	Research and confirm lack of reply briefs from Plaintiff on latest round of discovery motions and develop strategy re same.	0.30	210.00
08/06/21	Tyler R. Andrews	Update client on [REDACTED] [REDACTED]	0.20	140.00
<u>Total Time:</u>			3.40	
<u>Total Fees:</u>				\$ 2,380.00

Invoice No.: 5800229
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

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Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
04/26/21	Lexis Charges: 04/26/21 US TREATISES Requested by RABE, BETHANY Ref: 156688.028600	\$ 158.40
04/26/21	Lexis Charges: 04/26/21 SEARCH Requested by RABE, BETHANY Ref: 156688.028600	\$ 21.20
04/28/21	Lexis Charges: 04/28/21 SEARCH Requested by RABE, BETHANY Ref: 156688.028600	\$ 59.40
Total Expenses:		\$ 239.00



Invoice No. : 5823223
File No. : 156688.028600
Bill Date : November 9, 2021

Groupon, Inc.
[REDACTED]
[REDACTED]
Chicago, IL 211106

Attn: [REDACTED]
[REDACTED]

INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through October 31, 2021:

Total Fees: \$ 18,406.00

Current Invoice: \$ 18,406.00

Previous Balance (see attached statement): \$ [REDACTED]

Total Amount Due: \$ [REDACTED]

* * * * *

MKG:AR
Tax ID: 13-3613083

Invoice No.: 5823223
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
10/15/21	Tyler R. Andrews	Receive and conduct initial review of motion for leave to file FAC, and second motion for reconsideration, filed by Plaintiff LVS (0.8); Prepare strategy for oppositions and response (0.6); Update client re [REDACTED] (0.3).	1.70 .43	1,190.00 297.50
10/18/21	Tyler R. Andrews	Correspondence to client regarding new motions filed by Plaintiff (0.3); Outline options and strategy for oppositions (0.3); Research [REDACTED] [REDACTED] Research on [REDACTED] (0.3).	0.90 .23	630.00 157.50
10/18/21	Bethany L. Rabe	Review Plaintiff's motion for leave to file first amended complaint and second motion for reconsideration.	0.30 .08	117.00 29.25
10/20/21	Tyler R. Andrews	Continue working on strategy for response to LVS' latest motions.	0.70 .18	490.00 122.50
10/20/21	Mark E. Ferrario	Further develop strategy responsive to latest filings.	0.30 .08	210.00 52.50
10/20/21	Bethany L. Rabe	Begin outlining responses to new motions filed by plaintiff.	1.20 .3	468.00 117.00
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
10/21/21	Bethany L. Rabe	Begin drafting opposition to motion for reconsideration and opposition to motion for leave to amend.	3.80 .95	1,482.00 370.50
10/22/21	Tyler R. Andrews	Continue draft of oppositions in response to Plaintiff's motion for reconsideration (0.6); [REDACTED] [REDACTED] [REDACTED]	0.90 .15	630.00 105.55
10/22/21	Bethany L. Rabe	Work on opposition to motion for leave to amend complaint	5.20 1.3	2,028.00 507.00
10/23/21	Bethany L. Rabe	Finalize working drafts of motions.	1.70 .43	663.00 165.75
10/25/21	Tyler R. Andrews	Confer with client regarding [REDACTED] (0.3); Continue final revisions to opposition to motion for reconsideration and motion for FAC (0.9).	1.20 .3	840.00 210.00
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]
10/26/21	Tyler R. Andrews	Final revisions and drafting of oppositions to Plaintiff's motions and submit drafts to client for review and approval	2.00 .5	1,400.00 350.00
[REDACTED]	[REDACTED]	[REDACTED] [REDACTED]	[REDACTED]	[REDACTED]

Invoice No.: 5823223
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 2

Description of Professional Services Rendered

10/27/21	Tyler R. Andrews	antitrust claims Receive input and revisions from client on draft oppositions (0.2) and revise briefs per client input (0.6);	0.60	.15	420.00	105.00
10/27/21	Bethany L. Rabe	Continue working on oppositions to motions filed by plaintiff.	1.90	.48	741.00	185.25
10/28/21	Tyler R. Andrews	Review additional comments and edits of client (0.1) and incorporate same into draft oppositions to Plaintiff's recent motions (0.2); Develop strategy of final arguments to include (0.6).	0.90	.23	630.00	157.5
10/28/21	Bethany L. Rabe	Revise opposition to motion to amend complaint to be more streamlined in the futility section	2.20	.55	858.00	214.50
10/29/21	Tyler R. Andrews	Prepare final draft oppositions that incorporate all revisions and client comments (1.1); Confer with client on [REDACTED] (0.3).	1.40	.35	980.00	245.00
		[REDACTED]				
10/29/21	Bethany L. Rabe	Conduct final review and revisions of opposition briefs	1.40	.35	546.00	136.50
			<hr/>			
			<u>Total Time:</u>	37.10	7.04	
			<u>Total Fees:</u>		\$ 18,406.00	\$3,528.25

Invoice No.: 5823223
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

Page 3

Description of Expenses Billed:

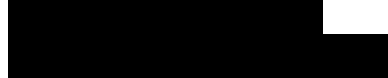
<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
-------------	--------------------	---------------

No expenses charged to this file



Invoice No.: 5849984
File No.: 156688.028600
Bill Date: December 7, 2021

Groupon, Inc.



Chicago, IL 211106

Attn:




INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through November 30, 2021:

Total Fees: \$ 771.00

Current Invoice: \$ 771.00

Previous Balance (see attached statement): \$ 

Total Amount Due: \$ 

MKG:AC

Tax ID: 13-3613083

Invoice No.: 5849984
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
11/05/21	Tyler R. Andrews	Receive and review Plaintiff's reply in support of motion for leave to file amended complaint.	0.60	420.00
11/08/21	Bethany L. Rabe	Evaluate replies filed by Plaintiff.	0.40	156.00
			<u>Total Time:</u>	1.50 1.0
			<u>Total Fees:</u>	\$ 771.00 \$576.00

Invoice No.: 5849984
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

Page 2

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file



Invoice No.: 5902913
File No.: 156688.028600
Bill Date: January 4, 2022

Groupon, Inc.
[REDACTED]
[REDACTED]
Chicago, IL 211106

Attn: [REDACTED]
[REDACTED]

INVOICE

Re: Las Vegas Skydiving Adventures
Claim #:groupon-6105374

Legal Services through December 31, 2021:

Total Fees: \$ 1,680.00

Current Invoice: \$ 1,680.00

Previous Balance (see attached statement): \$ [REDACTED]

Total Amount Due: \$ [REDACTED]

MKG:AR

Tax ID: 13-3613083

Invoice No.: 5902913
 Re: Las Vegas Skydiving Adventures
 Matter No.: 156688.028600

Page 1

Description of Professional Services Rendered:

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>DESCRIPTION</u>	<u>HOURS</u>	<u>AMOUNT</u>
12/22/21	Tyler R. Andrews	Receive and review order from Magistrate denying LVS' motion to file first amended complaint (0.6); Develop strategy re [REDACTED] [REDACTED] [REDACTED] (0.7); Draft update to client re same (0.2)	1.50	1,050.00
12/27/21	Tyler R. Andrews	Update client with result of ruling on Plaintiff's motion to file FAC (0.2); Develop strategy for [REDACTED] [REDACTED] (0.6).	0.90	630.00
			<u>Total Time:</u>	2.40
			<u>Total Fees:</u>	\$ 1,680.00

Invoice No.: 5902913
Re: Las Vegas Skydiving Adventures
Matter No.: 156688.028600

Page 2

Description of Expenses Billed:

<u>DATE</u>	<u>DESCRIPTION</u>	<u>AMOUNT</u>
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No expenses charged to this file

Exhibit 2



Mark E. Ferrario

SHAREHOLDER
ferrariom@gtlaw.com

LAS VEGAS
T +1 702.792.3773



Mark E. Ferrario is Co-Chair of the National Construction Law Practice and focuses his practice on complex civil litigation and construction law. He is an experienced trial lawyer who has utilized his persuasive skills to obtain favorable results in a wide variety of high profile matters. He serves as lead counsel in jury trials, bench trials and arbitrations as well as appeals in matters involving construction, securities, contracts, civil rights, election and tort law. Mark appears in front of regulatory and legislative bodies on behalf of his clients. He regularly provides counsel to his clients on a variety of risk management topics.

Prior to attending law school, Mark worked in the hotel casino industry in various capacities. He is AV Rated by Martindale-Hubbell and has been recognized as one of the top attorneys in Nevada.

Concentrations

- Commercial litigation
- Corporate litigation/corporate risk management
- Civil rights defense
- Construction litigation
- Securities litigation
- Election litigation

Capabilities

[Litigation](#) | [Construction Law](#) | [Gaming](#) | [Trade Secrets](#)

Experience

Complex Commercial Litigation

- Represented a major shareholder in prosecuting her claims in the Wynn v. Okada litigation. The claims involved issues of corporate governance and enforceability of a shareholder's agreement.
- Represented a major shareholder in the investigation and hearing conducted by the Massachusetts gaming regulators regarding the Encore property in Massachusetts.
- Represented the owner in the MGM City Center litigation, a complex construction dispute with over 400 million dollars at stake. The case was projected to take nine-to-twelve months to try. After six weeks of jury selection the case settled.

- Served as lead counsel for a government contractor on a False Claims Act case in Louisiana involving several claims arising from the Hurricane Katrina disaster. After eliminating a number of claims through motion practice, the case settled on the first day of trial.
- Worked as part of a team that recovered approximately 94 cents on the dollar for clients defrauded in a highly publicized scheme through which a 1031 exchange company defrauded investors of approximately \$97 million.
- Acted as one of the lead lawyers in a suit against Park Place Entertainment arising from the failed sale of the Las Vegas Hilton which resulted in a favorable settlement for his client.
- Prosecuted a case against a major casino resort preventing them from ousting a major restaurant and nightclub.
- Reached a favorable outcome for a title company defending against fraud claims, with no recovery for the plaintiffs.
- Served as member of the lead trial team in the \$90 million lawsuit that resulted from the 1988 PEPCON chemical plant explosion in Henderson, Nevada which resulted in settlements totaling approximately \$87 million.
- Worked on both the MGM Grand and Hilton Hotel fire cases obtaining a favorable result for his client, a major subcontractor on both projects.
- Achieved dismissals and other favorable outcomes for a gaming company in claims that gaming jackpots were not properly paid.
- Achieved a favorable outcome before a three member arbitration panel for a business owner defending against a \$7 million construction claim brought by a national contractor in an AAA arbitration matter.
- Achieved a favorable outcome for a subcontractor seeking \$2.5 million in compensation from a national contractor and a major casino resort.
- Achieved a favorable outcome for a major local builder in one of the first significant suits by the federal government regarding enforcement of the Fair Housing Act.

Election Litigation

- Persuaded the district court to strike unconstitutional provisions of the Nevada Clean Indoor Air Act., an anti-smoking ballot initiative, and continues to both defend that decision, as well as challenge the remaining offending provisions in the Nevada Supreme Court in 2008.
- Persuaded the Nevada Supreme court to strike substantial portions of the eminent domain initiative led by the Peoples Initiative to Stop the Taking of Land (PISTOL), preventing the devastation of Nevada development.
- Represented the Southern Nevada Home Builders Association during several sessions of the Nevada Legislature.

Civil Rights Defense

- Obtained dismissal of nearly all claims of IDEA and civil rights violations, leading to a settlement in favor of a school district.

- Obtained summary judgment in favor of a school district on claims that a teacher's free speech rights were violated.
- Achieved summary judgment for an exclusive southern Nevada country club and prominent developer against highly publicized allegations of federal civil rights violations.

General/Employment Litigation

- Represented employers in Federal and State Court wage and hour collective and class action cases, employment discrimination claims (administrative and litigation), and enforcement of noncompetition and confidentiality claims.
- Achieved a settlement mid-trial for a plaintiff in a medical malpractice suit involving catastrophic injuries.
- Defended local nightclub in an arbitration claim by a disc jockey.
- Represented a number of businesses in a wide variety of disputes achieving favorable results in a number of different areas.

Administrative Litigation

- Represented casino owner Lonnie "Ted" Binion in his lengthy legal battle with Nevada gaming regulators to maintain his gaming license.
- Retained as special counsel to the Select Committee on the Assembly in regard to the expulsion of a member of the assembly.

°Some of the above representations were handled by Mr. Ferrario prior to his joining Greenberg Taurig, LLP.

Recognition & Leadership

Awards & Accolades

- Listed, *The Best Lawyers in America*, Commercial Litigation; Litigation - Banking and Finance; Litigation - Construction; Litigation - Labor and Employment; Litigation - Real Estate, 2010-2022; Bet-the-Company Litigation, 2022
 - Named, "Lawyer of the Year," Litigation - Construction, Las Vegas, 2021
 - Named, "Lawyer of the Year," Litigation - Real Estate, Las Vegas, 2018
 - Named, "Lawyer of the Year," Litigation - Banking and Finance, Las Vegas, 2015
- Listed, *Chambers USA Guide*, 2007-2021
- Listed, *Super Lawyers* magazine, *Mountain States Super Lawyers*, 2010-2021
 - *Top 100 Lawyers in the Mountain States*, 2017 and 2021
- Listed, *VEGAS INC*, "Top Lawyers," 2012-2013, 2021
 - Litigation, 2013

- Construction & Land Use, 2012
- Listed, *Nevada Business* magazine, "Legal Elite: The Silver State's Top Attorneys," 2011-2013, 2016 and 2020
- Team Member, *Daily Business Review's* "Real Estate Litigation Department of the Year," 2015
- Rated, AV Preeminent[®] 5.0 out of 5.0

°AV[®], AV Preeminent[®], Martindale-Hubbell DistinguishedSM and Martindale-Hubbell NotableSM are certification marks used under license in accordance with the Martindale-Hubbell[®] certification procedures, standards and policies.

Professional & Community Involvement

- Board Member, Nevada Federal Credit Union, Board of Directors, 1996-Present
- Board Member, Safe Nest, Board of Trustees
- Member, Clark County Bar Association
- Member, State Bar of Nevada
 - Former Member, Professionalism Committee

Credentials

Education

- J.D., University of California at Los Angeles, School of Law, 1981
- B.S., Accounting, University of Nevada, Las Vegas, 1978

Admissions

- Nevada
- California

News, Insights & Events

Mark frequently lectures on construction-related issues and given presentations to trade groups on construction law. He also participates in panel discussions representing clients in contested matters in front of the Nevada gaming regulators.

May 24, 2021 PRESS RELEASE

8 Greenberg Traurig Nevada Attorneys & 4 Practices Areas Ranked in 2021 Chambers USA Guide

June 09, 2020 PRESS RELEASE

Four Greenberg Traurig Attorneys are Among Nevada's 'Legal Elite'

August 20, 2019 PRESS RELEASE

16 Greenberg Traurig Las Vegas Attorneys Listed in the 2020 Edition of Best Lawyers in America

May 09, 2019 PRESS RELEASE

7 Greenberg Traurig Las Vegas Attorneys & 4 Practices Included in 2019 Chambers USA Guide

July 30, 2018 PRESS RELEASE

Greenberg Traurig Represents Special Committee of Independent Directors in RLJ Entertainment Inc.'s Going-Private Merger with AMC Networks, Inc.

June 13, 2018 PRESS RELEASE

15 Attorneys Listed as 2018 Mountain States Super Lawyers and Rising Stars

Exhibit 3



Tyler R. Andrews

SHAREHOLDER
andrewst@gtlaw.com

ORANGE COUNTY LAS VEGAS
D +1 949.732.6578 T +1 702.792.3773
T +1 949.732.6500



Tyler Andrews is a trial and appellate lawyer specializing in media, entertainment, real estate, and business disputes. Known for his practical approach to resolving conflicts and his courtroom creativity, Tyler has handled intellectual property claims, First Amendment matters, real estate disputes, employment class actions, TCPA violations, and numerous entertainment industry lawsuits.

Tyler and his team have secured high-profile litigation victories for a broad range of clients, including BASE Entertainment, O'Neill, NBC Universal, Cannondale, Nomura Securities, Floyd Mayweather, PayPal, Circle K, Yamaha, and Brett Daniels – the star and co-creator of the Broadway ensemble hit “The Illusionists.”

Tyler serves as the litigation liaison and pro bono coordinator for Greenberg Traurig’s Orange County office, and as Chair of the Orange County Bar Association’s Sports, Entertainment & Marketing Section. With active practices in both Southern California and Nevada, he has been listed in “Super Lawyers” for both Southern California and Mountain States since 2013. He was named as one of the “Top 20 up and coming attorneys in Nevada” by *Nevada Business Weekly* in 2011 and 2012, and a “Top 100 Lawyer in Las Vegas” by *MyVegas Magazine*.

Concentrations

- Business litigation
- Intellectual property enforcement
- Real estate litigation
- State and federal appeals
- Entertainment law
- Sports and apparel litigation

Capabilities

[Trial Practice](#) | [Litigation](#) | [Intellectual Property & Technology](#) | [Technology, Media & Telecommunications](#)
| [Appeals & Legal Issues](#) | [Antitrust Litigation & Competition Regulation](#) | [Intellectual Property Litigation](#)
| [Media & Entertainment Litigation](#)

Experience

Intellectual Property and Entertainment Litigation

- Live Stage/Contract: Obtained multimillion-dollar award for Brett Daniels, co-creator of the Broadway and internationally best-selling ensemble magic production “The Illusionists,” winning on all claims

against the show's producers, who were represented at trial by famed media litigator Charles Harder.

- Action Sports/Licensing: Secured client O'Neill's licensing rights and fees for leading world tour professional surfer Jordy Smith.
- Live Stage/Contract: Defended against a hostile takeover lawsuit and protected client BASE Entertainment's production rights to the live stage show *Absinthe*, dubbed the "number one greatest show in Las Vegas History."
- Sports/Copyright: Obtained summary judgment victory for world-renowned boxer Floyd Mayweather, accused of copyright infringement, and upheld verdict for client at Fourth Circuit Court of Appeals.
- First Amendment/anti-SLAPP: Defended media client and journalist against defamation and trade libel claims brought by CBD industry plaintiff, including multiple anti-SLAPP challenges before California Court of Appeal.
- Television/Contract: Defended media clients against breach of contract and right of publicity claims brought by former star contestant on NBC's "The Voice."
- Cybersquatting/Domain Name: Obtained summary judgment, statutory damages, and award of attorney fees for Two Plus Two Publishing on trademark and cybersquatting claims brought against professional poker player in federal court, and upheld judgment at Ninth Circuit Court of Appeals.
- Entertainment: Represented the leading live show production company in Las Vegas in numerous litigation matters involving ERISA, breach of contract, personal injury, real estate, and other issues.
- Entertainment: Defended prominent NBA player and negotiated settlement of personal injury claims against him for small fraction of Plaintiff's demand.
- Copyright: Obtained summary judgment for client in copyright litigation between two leading international janitorial supply companies.
- Copyright: Obtained summary judgment against all copyright claims brought against international software development company client, plus order awarding the reimbursement of all fees and costs incurred.
- Rights of publicity: Obtained final judgment and permanent injunction in favor of world-renowned professional boxer whose name and likeness were infringed by multiple defendants.
- Patent: Prosecuted several infringement actions for major international auto-parts client.
- Trademark: Obtained judgment in favor of sports and yoga apparel company after challenge to validity of client's trademark brought by competitor, including transfer of the competitor's mark and domain name to client.
- Trade secret and copyright: Obtained multimillion-dollar judgment for medical device client in federal action against former partner for copyright infringement, deceptive trade practices, and misappropriation of trade secrets.
- Trademark Trial and Appeal Board (TTAB): Appealed USPTO's denial of sunglass manufacturer's trademark application after oral argument before TTAB in Washington, D.C.

Business and Technology Litigation

- Telephone Consumer Protection Act (TCPA): Obtained complete summary judgment for entertainment industry client in a landmark TCPA text message class action decision, adopting argument that “human intervention” precluded liability under the statute.
- Telephone Consumer Protection Act (TCPA): Obtained full dismissal of TCPA robocall litigation against university client by demonstrating that client’s conduct did not fall within the scope of the statute.
- Telephone Consumer Protection Act (TCPA): Represent numerous entities in defending TCPA class action allegations based on text message, junk fax, and robocall allegations in various federal judicial districts throughout the country.
- Antitrust: Obtained summary judgment for medical industry client in federal court after alleged violations of Robinson-Patman Act.
- Contract: Obtained full dismissal of breach of contract and intentional interference claims against international industrial and mining pipe supply company.
- Employment: Defended all claims brought by a former executive against major international gaming company and its officers.
- Employment: Secured injunction and finding of contempt against rogue ex-officer of leading environmental services client during employment litigation, plus award of costs and fees in favor of client.
- Employment: Obtained summary judgment on all claims brought against leading Las Vegas pharmacy client by former manager and shareholder of client, plus an order divesting plaintiff of his stake in company.
- Dissenting Shareholders: Defended entity and its board of directors against excessive valuation and fiduciary duty claims brought by dissenting shareholders after buy-out merger.
- Bankruptcy: Obtained finding of non-dischargeability in District of Nevada after attempt to discharge a multimillion-dollar jury trial judgment, and upheld ruling through appeal and oral argument before Ninth Circuit Bankruptcy Appellate Panel.
- Bankruptcy: Obtained full non-dischargeability judgment for client in bankruptcy adversary action in the Southern District of California, plus an award of interest, costs and attorney’s fees against debtor.
- Wrongful death: Obtained summary judgment and a full dismissal with prejudice for a mass-transportation client after auto accident.
- Wrongful death: Obtained summary judgment and a full dismissal with prejudice for real estate operator after death on property following altercation with security.

Real Estate Litigation

- Land use and abuse of process: Obtained a multimillion-dollar verdict for client, plus a multimillion-dollar award of punitive damages, after jury trial against a large Nevada real estate developer.
- Mortgage fraud/breach of contract: Obtained full defense verdict after federal jury trial, plus an award of costs and attorney’s fees, for a major international securities client
- Mortgage fraud: Represent leading title company in Nevada and obtained full dismissals through summary judgment on several actions relating to Las Vegas residential real estate filed in California

Superior Court and Central District of California.

Previous Experience

- Candidate, Nevada State Assembly District 10, Las Vegas, 2010

Internships

- Judicial Extern, Hon. Thomas J. Whelan, U.S. District Court for the Southern District of California, 2004
- Legal Intern, Constitutional Studies, CATO Institute, 2003

Recognition & Leadership

Awards & Accolades

- Listed, *Super Lawyers* magazine,
 - *Mountain States* "Super Lawyer," 2013-2019
 - *Southern California Super Lawyers*, "Rising Star," 2018
- Listed, *MyVegas* magazine
 - Top 100 Lawyers in Las Vegas, 2020
- Listed, *Nevada Business* magazine
 - "Legal Elite - 50 Best Up & Coming Attorneys," 2012
 - "20 Best Up & Coming Attorneys," 2011
 - "Up and Coming: The Silver State's Top Attorneys," 2011

Professional & Community Involvement

- Chair, Orange County Bar Association Sports, Entertainment & Marketing Section
- Member, American Bar Association
- Member, State Bar of California
- Member, Clark County Bar Association
- Member, Nevada State Bar Association
- Volunteer, Shoreline Church of San Clemente
- Volunteer, Nevada Legal Aid Center Children's Advocacy Project

Credentials

Education

- J.D., *cum laude*, University of San Diego School of Law, 2005
 - Order of the Coif
 - Member, San Diego National Appellate Moot Court Team
 - President, Federalist Society for Law and Public Policy Studies, San Diego Chapter, 2003-2005
- B.A., Mass Communications and Film Studies, University of California at Santa Barbara, 2000

Admissions

- California
- Nevada
- U.S. Court of Appeals for the Ninth Circuit
- U.S. Court of Appeals for the Fourth Circuit
- U.S. District Court for the Northern District of California
- U.S. District Court for the Central District of California
- U.S. District Court for the Southern District of California
- U.S. District Court for the District of Nevada
- Supreme Court of the United States

News, Insights & Events

March 13, 2020 PRESS RELEASE

Two Greenberg Traurig Attorneys Recognized Among ‘Top 100 Lawyers in Las Vegas’

June 13, 2018 PRESS RELEASE

15 Attorneys Listed as 2018 Mountain States Super Lawyers and Rising Stars

Exhibit 4



Bethany Rabe

OF COUNSEL
rabeb@gtlaw.com

LAS VEGAS
T +1 702.792.3773



Bethany Rabe focuses her practice on entertainment-related litigation, with particular interest in copyright, trademark, right of publicity, defamation, and Internet matters, as well as appellate litigation and brand management. Bethany also has a broad range of general commercial litigation experience.

Concentrations

- Copyright and trademark litigation
- Commercial and business litigation
- Digital Millennium Copyright Act (“DMCA”) compliance and litigation
- Removing infringing goods from online marketplaces
- Entertainment disputes
- Defamation and anti-SLAPP
- The Visual Artists Rights Act (“VARA”)
- Rights of publicity
- Appellate litigation

Capabilities

[Entertainment & Media](#) | [Litigation](#) | [Trademark & Brand Management](#) | [Intellectual Property & Technology](#)
| [Appeals & Legal Issues](#) | [Media & Entertainment Litigation](#)

Experience

Representative Matters

Bethany has played an active role in countless matters, including the teams that have:

- Enforced a pantomime copyright for Teller's famous “Shadows” illusion.
- Represented champion boxer Floyd Mayweather, including
 - Obtaining summary judgment (and affirmance on appeal) in a multimillion-dollar copyright infringement action involving his appearance on WWE's WrestleMania 24.
 - Litigating and ultimately resolving defamation litigation with boxer Manny Pacquiao.
 - Obtaining dismissal of the class-action lawsuit against Mr. Mayweather and others arising out of the 2015 Pacquiao-Mayweather fight.

- Obtaining final judgment and permanent injunction when Mr. Mayweather's name and likeness were infringed by multiple defendants.
- Represented the Grand Canyon Skywalk developer in defamation litigation.

Noteworthy Experience

- Extern, Clark County District Attorney's Office
- Captain, United States Air Force Reserve

Recognition & Leadership

Awards & Accolades

- Recipient, Legal Aid of Southern Nevada Lied Award, 2020
- Listed, Vegas Inc., "Top Lawyers," 2021
- Listed, *Super Lawyers* magazine, *Mountain States Super Lawyers*, "Rising Star," 2014-2015 and 2017-2020
- Recipient, Laurie Miller Public Service Award, 2019
- Recognized, Legal Aid Center of Southern Nevada, Pro Bono Awards, "100-Hour Club," 2018
- Team Member, a U.S. News - Best Lawyers®, "Law Firm of the Year" in Entertainment Law - Music, 2011-2012

Professional & Community Involvement

- Past Editor-in-Chief of *Litigation News*, the ABA Section of Litigation's flagship publication (circulation of approximately 30,000); Current Editorial Board Member and Editor-at-Large
- Teaching Fellow, CopyrightX (an online copyright course offered through Harvard Law School, the HarvardX distance learning initiative, and the Berkman-Klein Center for Internet and Society)
- Member, American Bar Association, Section of Litigation
 - Member, Intellectual Property Litigation Committee

Credentials

Education

- LL.M., Harvard Law School
- J.D., with distinction, University of Utah College of Law
 - Articles Editor, *Utah Law Review*
- M.P.P., Public Policy, John F. Kennedy School of Government, Harvard University

- B.S., with distinction, U.S. Air Force Academy

Admissions

- Nevada
- California
- U.S. District Court for the District of Nevada
- U.S. District Court for the Central District of California

News, Insights & Events

June 28, 2021 PRESS RELEASE

Eight Greenberg Traurig Attorneys are Among Vegas Inc's Top Lawyers

January 2021 PUBLISHED ARTICLE

Five Things to Know About Nevada's Anti-SLAPP Statute

December 17, 2020 PRESS RELEASE

Bethany Rabe Receives the Lied Award

March 12, 2020 PRESS RELEASE

Greenberg Traurig Elevates 3 Attorneys in Las Vegas

01.20 PUBLISHED ARTICLE

Ninth Circuit Knocks Out Boxing Fan Class Action Over Mayweather-Pacquiao Fight

October 18, 2019 PRESS RELEASE

Greenberg Traurig's Bethany Rabe Receives Prestigious Laurie Miller Public Service Award

November 28, 2018 PRESS RELEASE

Greenberg Traurig's Mark G. Tratos and Bethany Rabe Present at UNLV's 'Siegel on Entertainment Law' Event

August 07, 2018 PRESS RELEASE

**Greenberg Traurig's Bethany Rabe Appointed Editor in Chief of ABA's
Litigation News**

June 13, 2018 PRESS RELEASE

**15 Attorneys Listed as 2018 Mountain States Super Lawyers and Rising
Stars**